RCVD JAN 30 2018

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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ragazzine	Justin	Michael	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Tribal membership	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Youngstown	Ohio	44511	Mahoning	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17451009SC/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 01/08/2018

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      Panthera leo

   b. Sex (if known).
      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

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

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
      Zimbabwae, Save Valley Conservancy, Chishakwe Hunting Concession

   b. Date wildlife was hunted:
      November 27 2017

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

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
4 Josiah Chinamano Road
Belmont, Bulawayo
Zimbabwe

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

Name:	Cuan
Business Name:	Trophy Consultant International
Address:	4 Josiah Chinamano Road
Address:	
City:	Belmont
State/Province:	Bulawayo, Zimbabwe
Country, Postal Code:	

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: (b) (6) Date: 1/8/18

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

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

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

   Fauna & Flora Custom House Brokers
   15231 135TH Ave
   Jamacia, NY. 11434

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

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

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

John Meehan
(b) (6)
(b) (6)

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

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

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
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June 19, 2019

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

RE: PRT No. MA74840C-0 / Lion Trophy, Zimbabwe / Justin Ragazzine

Dear Chief Cogliano:

Please find enclosed a notice of representation for Justin Ragazzine's application for a Lion (Panthera leo) Trophy from Zimbabwe.

PRT No. MA74840C-0

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

Sincerely,

John J. Jackson III

encl:

- Notice of Representation, Justin Ragazzine

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

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: Justin Ragazzino

Date: 10/24/18

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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SHANE MAHONEY
RENEE SNIDER

August 20, 2019

RCVD AUG 29 2019 LB

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

RE: PRT No. MA74840C-0 / Lion Trophy, Zimbabwe / Justin Ragazzine

Dear Chief Cogliano:

As a supplement to our existing application for a Lion Trophy Import permit from Zimbabwe for Justin Ragazzine, please find enclosed the following supporting documents:

Lion Hunting in Zimbabwe's Savé Valley Conservancy (2013)
Carnivore Densities in the Savé Valley Conservancy (2017)
Conservation status of the African Lion in Zimbabwe (2015)

The above documentation highlights the healthy population of lions in the Savé Valley Conservancy and the benefits generated by regulated hunting for the protection of the lion, elephant, rhino and a range of other species. Please take this and the previously submitted material submitted by Conservation Force and Zimbabwe's Parks and Wildlife Management Authority (ZPWMA) into account in making a enhancement finding.

PRT No. MA74840C-0

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

Sincerely,

John J. Jackson III

encl:
Copy of Lion Hunting in Zimbabwe's Savé Valley Conservancy (2013)
Copy of Carnivore Densities in the Savé Valley Conservancy (2017)
Copy of Conservation status of the African Lion in Zimbabwe (2015)

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
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www.conservationforce.org

African Wildlife Conservation Fund

Savé Valley CONSERVANCY

Carnivore Densities in the Savé Valley Conservancy

Results of the 2017 Spoor Survey & Wild Dog Monitoring Project

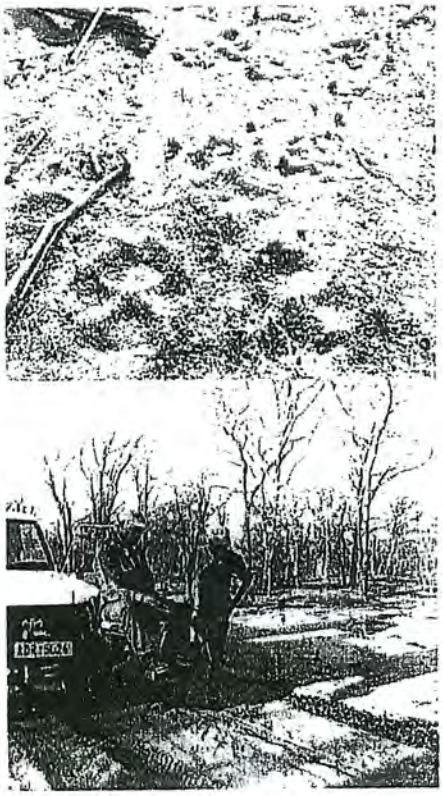
Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

Introduction

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

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

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



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

Methodology

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

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

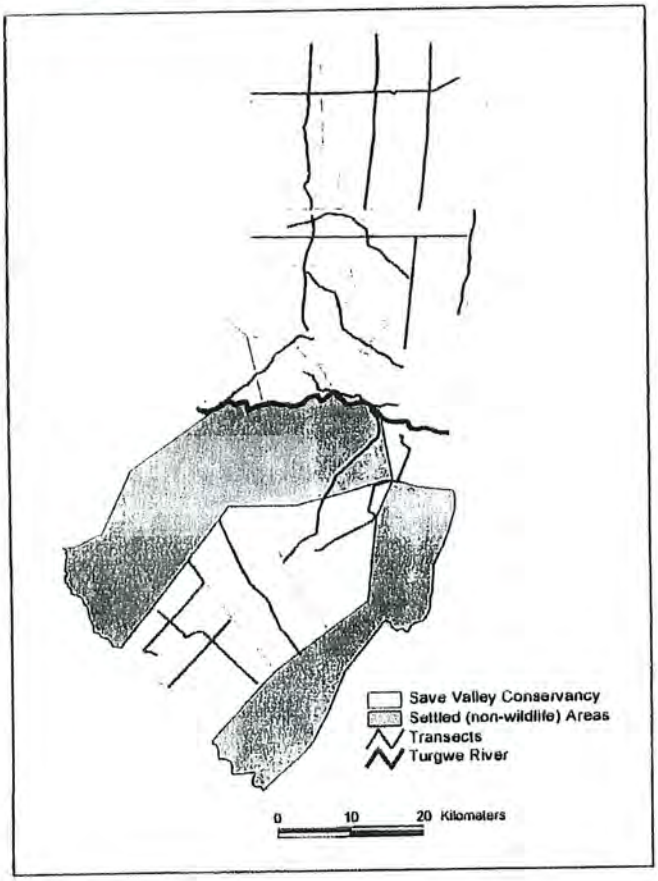
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

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

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

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

Figure 1. Map of the transects driven – October 2017



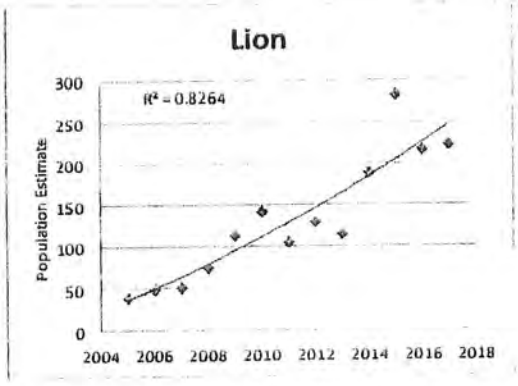
Results

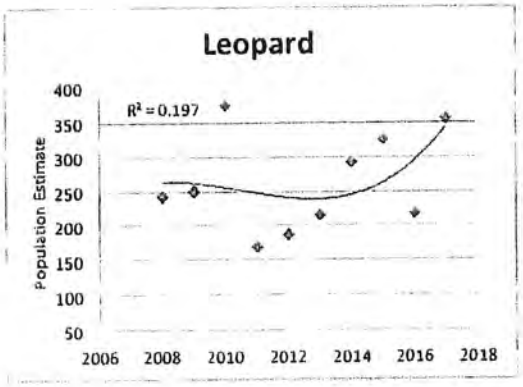
Table 1: Summary of survey parameters (2017)

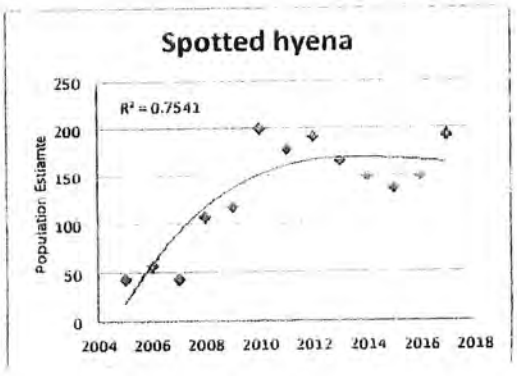
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km²)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

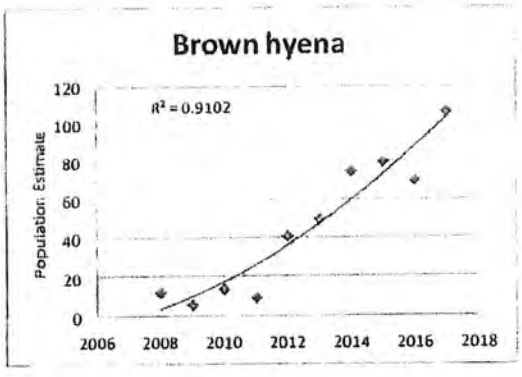
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs).

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









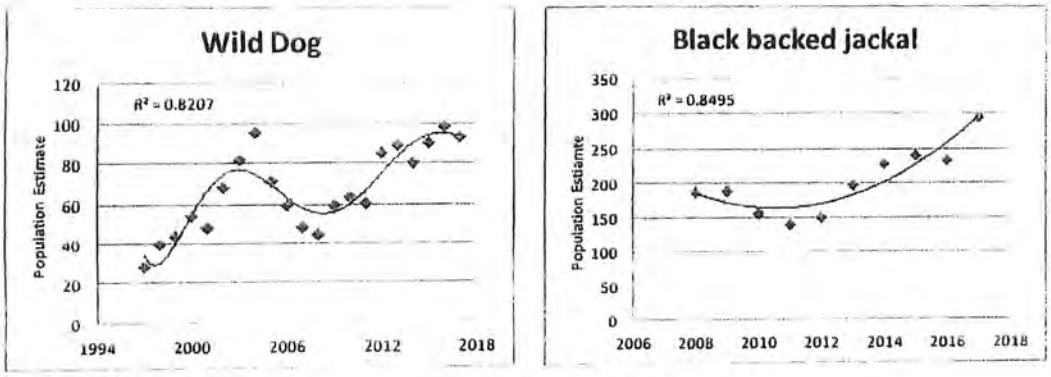


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken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

Discussion

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

Interpretation of results for each species

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Word of caution

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

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

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

NORTH SVC Species	Survey Area North SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	1639	278.042434	Leopard (Y=0.6993X)	16.96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011
Brown hyaena	1639	92.3646238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484
Cheetah	1639	3.848525992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369
Civet	1639	759.0999784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569
Honey Badger	1639	119.1610431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147
Leopard	1639	291.2825499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916
Lion	1639	188.5777736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906
Spotted hyaena	1639	138.5469357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727
Wild dog	1639	277.0938714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453
African Wildcat	1639	22.06685984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421
SOUTH SVC Species	Survey Area South SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	800.57	27.21437644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111
Brown hyaena	800.57	16.95095785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0
Civet	800.57	233.2660838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667
Honey Badger	800.57	3.887768063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.694444444
Leopard	800.57	73.86759319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.19444444
Lion	800.57	38.98720305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.97222222
Spotted hyaena	800.57	55.9381609	Lion (Y=0.3049X)	6.987291667	144	33	4.363636364	144	5.559513889	22.91666667
Wild dog	800.57	44.0724904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	0

TOTAL SVC Species	Survey Area Total SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed Jackal	2439	295.7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862
Brown hyaena	2439	106.8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429
Cheetah	2439	3.684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389
Civet	2439	980.1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714
Honey Badger	2439	118.2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448
Leopard	2439	359.11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904
Lion	2439	222.8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204
Spotted hyaena	2439	193.4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293
Wild dog	2439	313.1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808
African Wildcat	2439	21.12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473

Lion Hunting in Zimbabwe's Savé Valley Conservancy

Dr Rosemary Groom, African Wildlife Conservation Fund
(On behalf of the members of the Savé Valley Conservancy)

27th January 2013

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

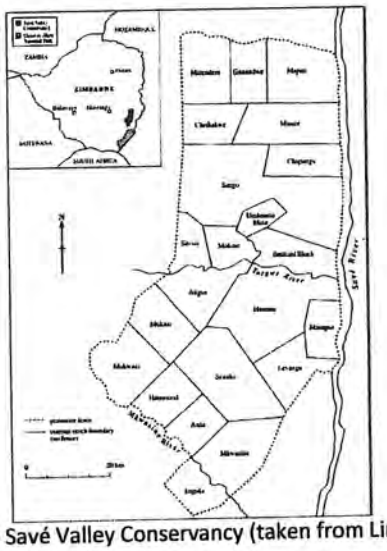


Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members then restocked the wildlife population (4410 animals; Table 1), removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	**Total**
African buffalo (*Syncerus caffer*)	91	88	253	40	**472**
African elephant (*Loxodonta africana*)	685	-	-	-	**685**
Black rhinoceros (*Diceros bicornis*)	-	31	-	-	**31**
Blue wildebeest (*Connochaetes taurinus*)	223	525	49	-	**797**
Burchell's zebra (*Equus burchellii*)	17	309	66	-	**392**
Giraffe (*Giraffa camelopardalis*)	36	101	44	-	**181**
Lichtenstein's hartebeest (*Alcelaphus lichtensteinii*)	-	-	-	28	**28**
Livingston's eland (*Tragelaphus oryx*)	215	263	102	-	**580**
Nyala (*Tragelaphus angasii*)	22	43	11	26	**102**
Lion (*Panthera leo*)	**-**	**3**	**-**	**10**	**13**
Spotted hyena (*Crocuta crocuta*)	-	-	-	3	**3**
Ostrich (*Struthio camelis*)	-	-	71	-	**71**
Sable antelope (*Hippotragus niger*)	49	203	122	-	**374**
Tsessebe (*Damaliscus lunatus*)	-	97	-	-	**97**
Warthog (*Phacochoerus aethiopicus*)	-	207	-	-	**207**
Waterbuck (*Kobus ellipsiprymnus*)	177	66	82	32	**357**
White rhinoceros (*Cerathotherium simum*)	-	-	-	20	**20**
TOTAL					**4410**

3 Trophy hunting versus Photo tourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings. After four years of

seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

4 Lions in the Savé Valley Conservancy

After the conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990s / early 2000s. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004-5 there were some reports of cubs. During this period 13 lions were also reintroduced into SVC. After an initial lag phase the lion population on SVC has increased dramatically and at present is growing exponentially (Figure 1, Groom 2012).

In 1993, three lions were brought into the conservancy by Humani Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the lion population is currently only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless population control measures are implemented.

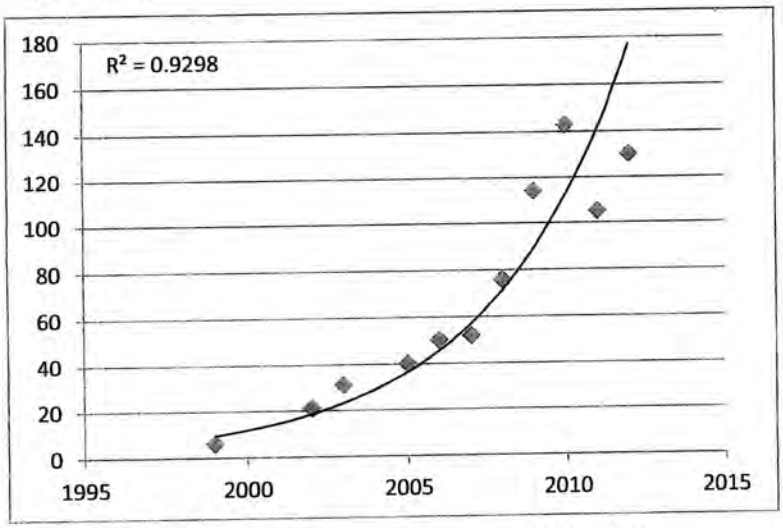


Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012).
Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100%	100%	100%	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. $2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of $10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US $1,365,000 in bed nights and $260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. $375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

It should be noted that lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed annual investments of US$ 150,000 – 240,000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). In addition, a central anti-poaching unit operates specifically to provide protection for the conservancy's black rhino, *Diceros bicornis,* population (one of only three remaining populations in Zimbabwe that is defined as having long-term viability in demographic and genetic terms). The operating costs of this unit amount to over $200,000 per year and are shared between the conservancy members and donors. As rhinos are not trophy hunted in Zimbabwe, members' share of these costs need to be generated some other way – and lion hunting is an important contributor. Thus a removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs, *Lycaon pictus*, and especially black rhinos.

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US$100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers.

The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

7 References

Becker, M., McRobb, R., Watson, F., Droge, E., Kanyembo, B., Murdoch, J. & Kakumbi, C. (2013). Evaluating wire-snare poaching trends and the impacts of by-catch on elephants and large carnivores. Biological Conservation **158**, 26-36.

Bond, I. (1993) The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe

Child, B (1988) The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. DPhil Thesis, University of Oxford, Oxford, UK

Cumming, D.H.M (1993) Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Funston, P.J. (2011) The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy

Groom, R.J. (2012) Carnivore densities in the Savé Valley Conservancy: 2012. Report for the Savé Valley Conservancy

Hayward, M.W., O'brein, J. & Kerley, G.I.H. (2007) Carrying capacity of large African predators: predictions and tests. Biological Conservation, **139**, 219-229

Jansen, D.J., Child, B. & Bond, I. (1992) Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe

Lindsey, P., du Toit, R., Pole, A. & Romanach, S. (2008) Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

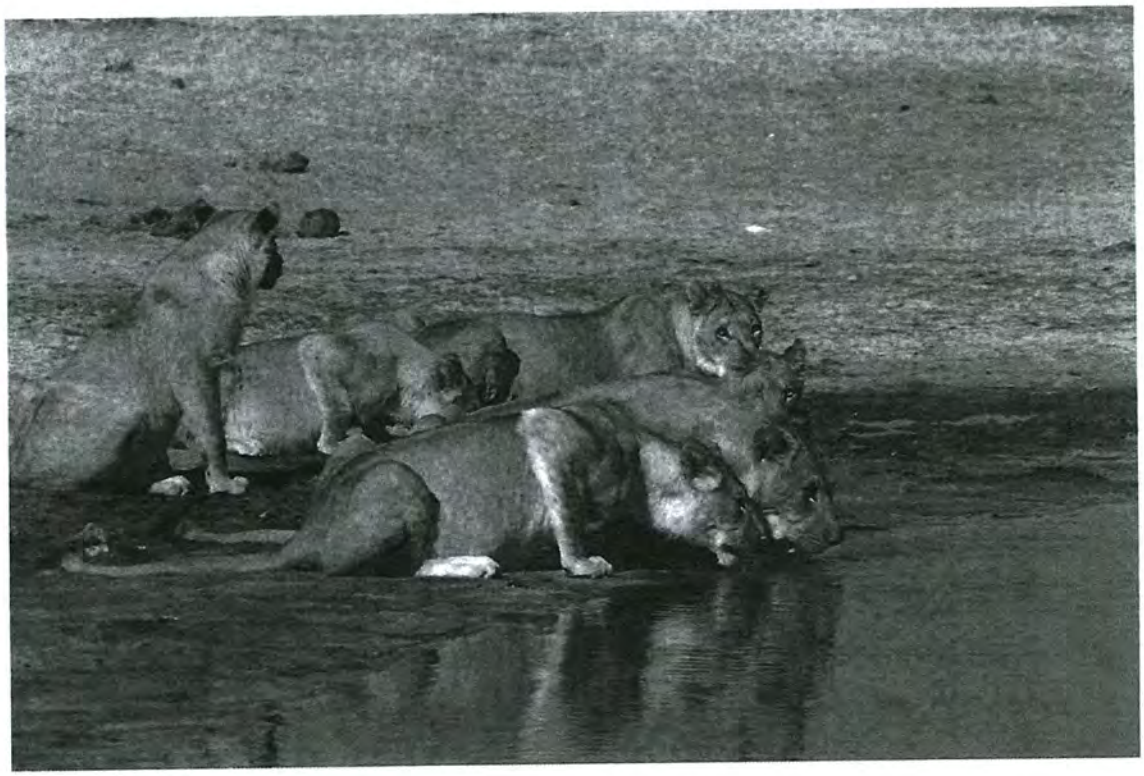
Lindsey, P., Romanach, S., Tambling, C., Chartier, K. & Groom, R.J. (2011) Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx, **45**, 96-111

Pole, A. (1999) The behaviour and ecology of African wild dogs, *Lycaon pictus*, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland

du Toit, R. (1989) Proposal for Savé Valley Conservancy. Unpublished report for the Intensive Conservation Areas Committee, October 1989, Harare, Zimbabwe

du Toit, R. (1994) The Savé Valley Conservancy. In: The Lowveld Conservancies: New opportunities for productive and sustainable land use, pp. 28-36: Price Waterhouse Wildlife, Tourism and Environmental Consulting, Zimbabwe

CONSERVATION STATUS OF THE AFRICAN LION (*Panthera leo*) IN ZIMBABWE



ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
JANUARY 2015

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1.0 INTRODUCTION

The African lion (*Panthera leo*) is an important species that plays a big role in the savannah ecosystem. It is a flagship species with huge social, economic and ecological values. It is a powerful symbol for Africa, and yet living with lions poses hardships for many communities. In some areas, the lion is a major predator on domestic livestock leading to profound conflicts with local communities.

The lion is not only a source of personal and economic damage and danger but is also of economic and personal benefits. The species contributes positively to the livelihoods of local communities through sport hunting. Trophy hunting also contributes to the conservation of lions through financial benefits that are ploughed back into its conservation and that local communities use for rural development programmes. Trophy hunting of the African lion is undertaken through a strict scientific based quota setting process with an objective of ensuring that utilization and any form of harvesting is sustainable.

Zimbabwe is one country that sustainably manages its lion population inside and outside protected areas. The African lion population is increasing in most areas. Research and monitoring of the species is being done collaboratively with external researchers and there is a lot of baseline information and publications. Zimbabwe has a lion management plan and strategy that is being implemented and reviewed on a regular basis. Rigorous monitoring of lion trophy hunting through adaptive management principles is carried out in Zimbabwe and non-detrimental findings are conducted for all exports. In conclusion, harvesting and any other forms of off take are not detrimental to the survival of the African lion in Zimbabwe.

2.0 SPECIES BIOLOGY AND LIFE HISTORY CHARACTERISTICS

2.1 Taxonomy

Class	Mammalia
Order	Carnivora
Family	Felidae
Species	*Panthera leo*
English	African lion
Shona	Shumba
Ndebele	Islwane

African lions are the only social fields, with each pride comprising an average of 4 to 6 adult lionesses, their dependent offspring, and a temporary coalition of pride males. In lion prides there is no dominance hierarchy amongst lionesses, and female lions are "free agents" who only contribute to communal care when they have cubs of their own. Although the pride is a stable social unit, it is a fission–fusion social group, in which individuals are typically found in a range of subgroup sizes and compositions. Although earlier studies suggested otherwise, grouping patterns within lion prides are not associated with foraging efficiency or any other aspect of hunting. However Packer *et al.*, (1990) concluded that group territoriality and group defence of cubs are the main reasons for sociality in lions. Mosser *et al.*, (2009) conclude that female sociality has largely to do with interactions between neighbouring prides supporting the group territorial hypothesis. Larger prides/subgroups usually win encounters with neighbouring prides (Packer *et al.*, 1990; Grinnell *et al.*, 1995). Larger prides are generally found in higher quality habitats, which typically have numerous buffalo herds and several river confluences (Mosser 2008). The threat posed by neighbours leads to larger group sizes than does the threat of infanticide (Mosser *et al.*, 2009). Cooperative defence against infanticide is another benefit of grouping for female lions (Pusey & Packer 1994). Playback experiments revealed that pride with dependent cubs typically retreat from foreign males, but that lionesses approach female intruders (Mc Comb et al., 1993, 1994).

Leaving cubs unprotected puts them at considerable risk, suggesting that the need to respond to territorial threat may often override the value of protecting cubs. Cooperative defence against infanticide is another benefit of grouping for female lions (Pusey & Packer 1994).

Although pride males are not always with the pride they fulfil a key function defending the pride and chasing off would be invading or "infanticidal males". In order to do so, males typically form coalitions of two or three males, with solitary males seldom being able to defend a territory. Territories are defended through roaring, patrolling, scent marking and direct aggressive encounters. Importantly male lions impact their reproductive success, mortality and wounding of females. Neighbouring resident males also influence the female grouping patterns within larger prides, and improve the quality of their own pride"s territory. Thus male lions are important in group-territorial competition and may use lethal aggression to tip the balance of power in favour of their prides (Mosser et al. 2009). Numerical advantage may additionally benefit large male coalitions by reducing levels of inter-pride competition for their females. The effects of intergroup competition between females are direct and immediate, so much so that male coalitions attempt to modify the dynamics of territorial competition. Group-territorial competition therefore provides strong selection for sociality in both male and females lions. Lions are matrilineal (females stay in their natal pride), with one-third of females dispersing to form new prides (Pusey and Packer 1987). Males leave their natal pride by the age of 4 years and remain solo or form a coalition with other males (Pusey and Packer 1987). Large coalitions of young males (4-5 years of age) are able to easily oust single pride males from their territories, and in areas with no males older than six years of age successfully maintaining reproduction in lion prides

Although there is *not yet any empirical evidence* on how the group territorial nature of lions is affected by excessive trophy hunting, the findings from Mosser *et al.*, (2009) suggest that these could be substantive. Without males to co-operate in group territorial defence lionesses might:

- Have to alter their groupings patterns (which may have as yet not described negative consequences)
- Lose more cubs to infanticide, both from foreign males and ***importantly to lionesses from neighbouring prides*** that will kill cubs if the opportunity exists
- Experience higher wounding and mortality rates

3.0 LION DISTRIBUTION AND RANGE

In Zimbabwe, lions are found in three broad land use types, namely gazetted protected areas (parks estate and indigenous forest areas), CAMPFIRE areas and on private land.

3.1 Parks and Wildlife Estate

Parks Estate is under the jurisdiction of the Zimbabwe Parks and Wildlife Management Authority and covers about 13% of the area of the country (390 580 km^2). The Parks Estate comprises six categories of protected areas that are gazetted under the Parks and Wildlife Act, Chapter 20:14. The six categories of protected areas are national parks, recreational parks, sanctuaries, safari areas, botanical reserves and botanic gardens. In these areas, wildlife is the primary and only land use permitted except in botanic gardens.

The African lions occur in most of Zimbabwe Parks and Wildlife Estates with the exception of a few areas located in the high and central parts of the country i.e. Matopos National Park, Sebakwe, Ngezi, Chivero, Kyle and Chegutu Safari Area. There are no free ranging lions found in the country's recreational parks, which are located in areas of high human densities where conventional agricultural practices in the surrounding areas preclude the establishment of viable population sizes.

Recreational Parks are not suitable for lions due to the small size of the areas, existing prey base and are therefore subject to high human-wildlife conflict. Most of the National Parks and Safari Areas located on the borders of the country support lion populations. Connectivity of lion range has been enhanced by the creation of Transfrontier

Conservation Areas such as Greater Limpopo Transfrontier Park (GLTP) and Greater Mapungubwe Transfrontier Conservation Area. Trophy hunting of wildlife is legally permitted in safari areas. There are sixteen safari areas found in the country and lions are found in Matetsi in the north-western area, Chete, Chirisa (in the Sebungwe region), Charara, Hurungwe, Sapi, Doma (in the Zambezi Region), Malipati (South-eastern part of the country) and Tuli safari areas (Figure 1).

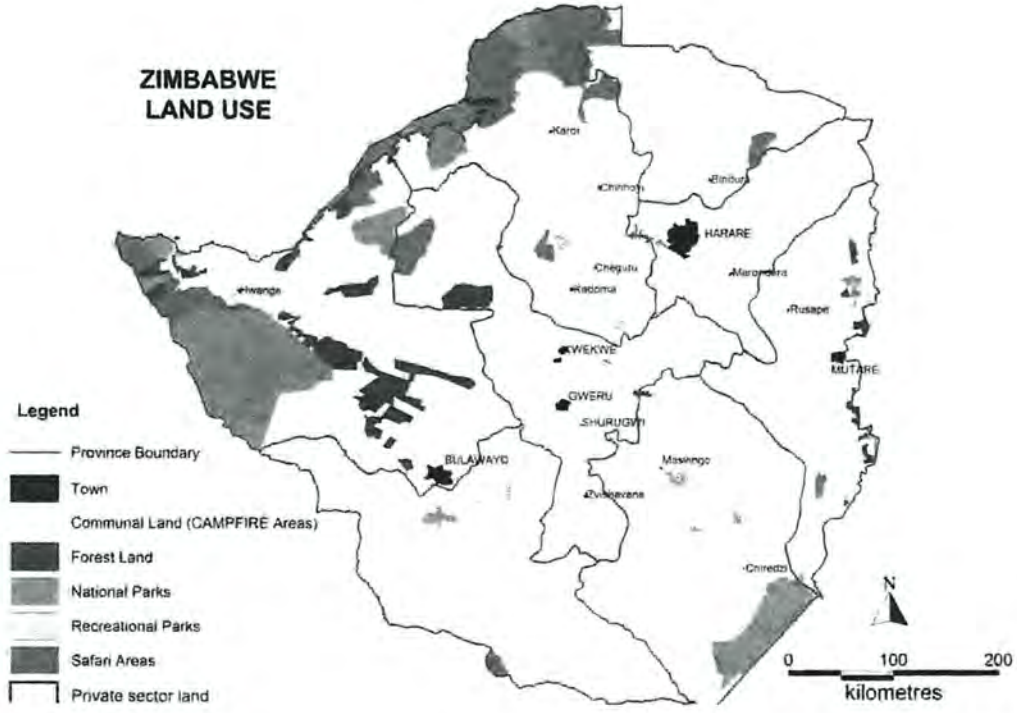


Figure 1: Map of Zimbabwe showing areas where trophy hunting is legally permitted.

3.2 Gazetted Indigenous Forest Areas

According to the Forest Act, Chapter 19:05, twenty-four gazetted indigenous forest areas

are under the jurisdiction of a State parastatal, Forestry Commission and cover about 880 000 ha (2%) of the area of the country. In gazetted indigenous forest areas, lions are found and hunted in Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira and Gwampa Forests. The above mentioned State gazetted areas are found on Kalahari sands in the north-western part of the country Zimbabwe.

3.3 Private Land

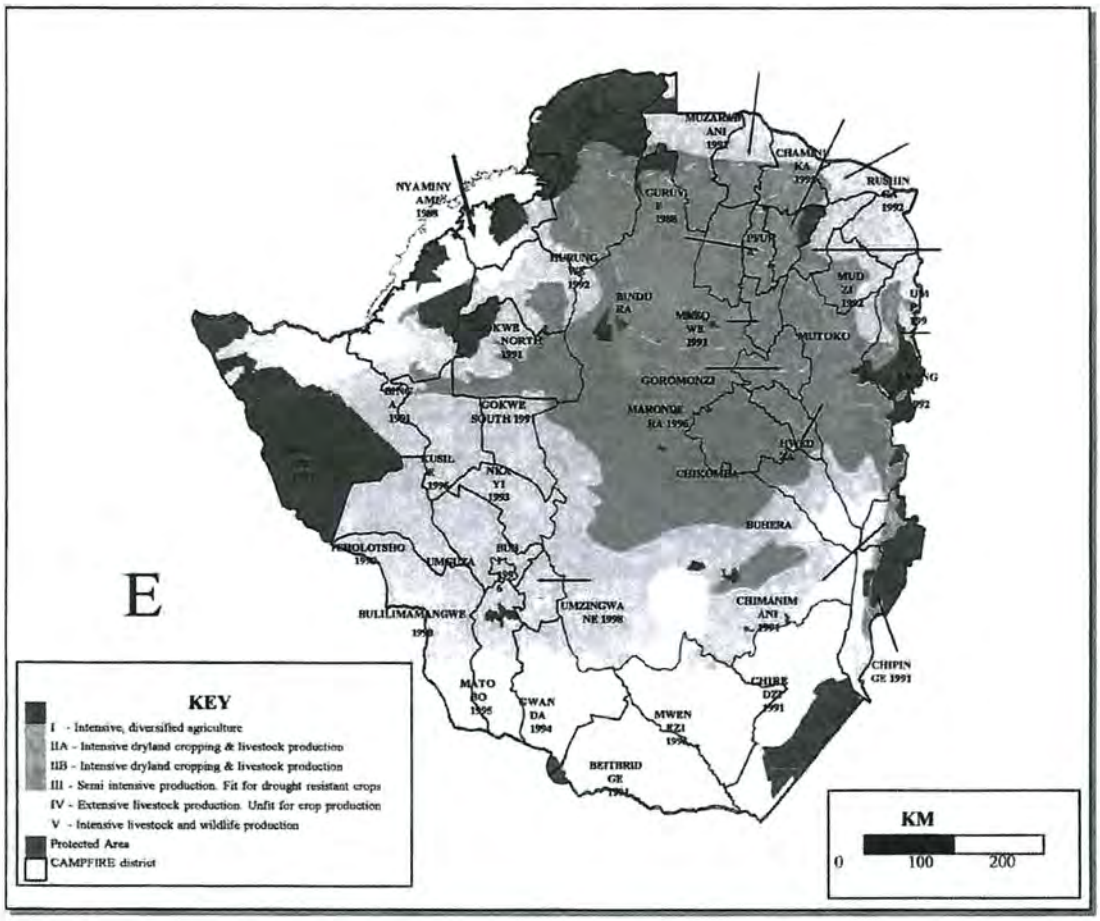
In 1960's there was a shift in wildlife policy from State control to individual proprietorship for white commercial farmers who could now benefit financially from the wildlife on their farms. In 1975, the Parks and Wildlife Act 14/1975 gave commercial farmers the right to exploit wildlife, including lions on their land. The Act legally formalized the policy shift towards sustainable utilization by aiming to confer privileges on owners or occupiers of alienated land as custodians of wildlife. The Act designated these owners or occupiers of alienated land as Appropriate Authorities over wildlife. On commercial private land, lions are found on single ranches and on conservancies. A conservancy is defined as a contractually legitimated entity which involves two or more recognized land and resource authorities. Most of the private farms that have lions are adjacent to major gazetted protected areas.

3.4 Communal Area Management Programme for Indigenous Resources

It was until 1982 that the right to exploit wildlife was extended to communal areas through granting the Appropriate Authority Status over their wildlife resources to Rural District Councils. Such Authority allows Rural District Councils to manage and benefit from wildlife resources occurring in them. The intention was to return rights of access to natural resources through legislative change, devolve responsibility and economic empowerment. The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) is the process through which Government is devolving the management of wildlife resource to communal farmers. Currently (January 2015), 58 Rural Districts have been granted the Appropriate Authority status to manage wildlife

resources in their areas. Lions are found in communal areas that are adjacent to major protected areas (Figure2). Lion hunting is allowed in CAMPFIRE districts. Outside of protected areas, lions largely exist on areas peripheral to National Parks.

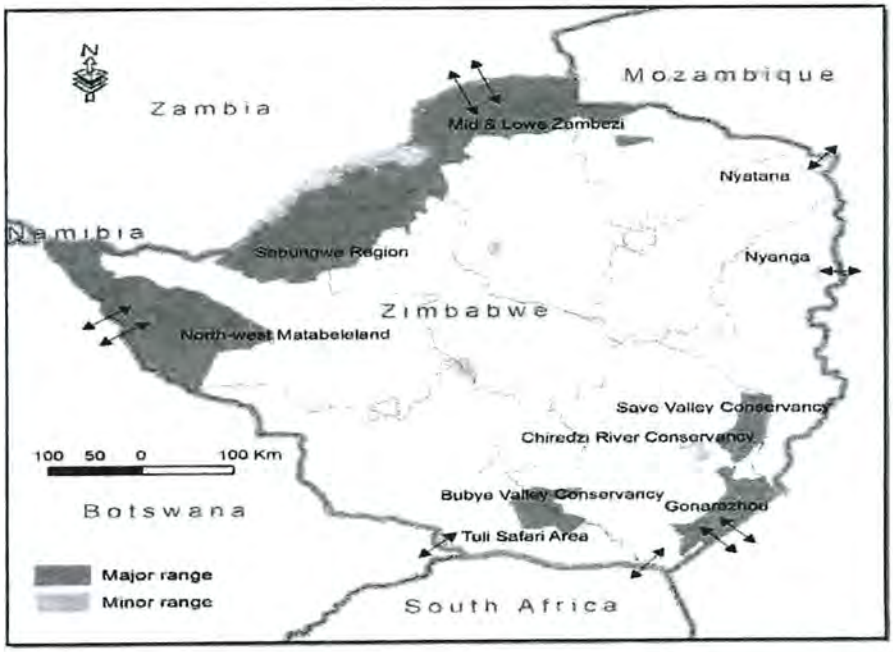
Figure 2: Map of Zimbabwe showing CAMPFIRE districts.



3.5 Summary Distribution of Lions

Figure 3 shows a summary of the distribution of lions in Zimbabwe. The distribution of the African lion in Zimbabwe coincides with the major wildlife areas in the country; which are as follows, the North West Matabeleland Region, Sebungwe Region, the Mid-Lower Zambezi valley and South-Eastern part of the country (Gonarezhou National Park, Save Valley Conservancy, Chiredzi River Conservancy, Malilangwe Conservancy, Beitbridge-Tuli complex). Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem which is about 25000 km^2, the Mid Zambezi Valley (17127 km^2), Sebungwe (15622 km^2) and the South East Lowveld (11000 km^2) (Table 3). In addition to the main geographic ranges listed above, lions are found on privately owned game farms, conservancies, and isolated state protected areas throughout the country. Occasional African lion sightings have been recorded in other areas from time to time such as Nyanga National Park in Zimbabwe's Eastern Highlands and Nyatana Wilderness in the North Eastern border with Mozambique.

Figure 3: African Lion (*Panthera leo*) Range in Zimbabwe (Zimbabwe Parks and Wildlife Management Authority, 2014)



3.6 Threats to Lion conservation in Zimbabwe

Human-Lion Conflicts

Butler in 2000 noted that countrywide in Zimbabwe's communal lands, 1 to 2% of cattle and 3.4% of goats were taken by predators. In the years 1999 to 2001, 32 reports were made in Nyaminyami District in Mashonaland West, with approximately 50 goats, 13 donkeys and one lion destroyed per year (Chardonnet at al, 2010). In traditional agro-pastoral regions, bordering National parks, livestock predation is a serious problem. In Gokwe communal lands 82 livestock, small and large were killed by lions (Butler 2000).

From 2002 to 2006, in all CAMPFIRE Rural District Councils, 58 Lions were reported as Problem Animals and of these, only 36 reports were attended to resulting in 9 lions being killed. In Mbire Rural District Council, 6 people were killed by lions and 12 lions were killed on Problem Animal Control in 2010 (CAMPFIRE Annual Report).

Human- lion conflict is a significant issue in areas around Hwange National Park where lions come into contact with local communities. Conflict is most intense in the wet season (November- April) when wild prey is sparsely distributed. Over 600 head of domestic stock have been lost directly adjacent to Hwange National Park between 2007 and 2011. Retaliatory killing accounts for close to 40% of recorded lion mortality, suggesting that this may be a significant threat to the population.

Depletion of prey base

Lion presence and abundance in an area is related to the abundance of its prey species which include zebra, buffalo, wildebeest, sable, impala and warthog. Depletion of this resource base in an area mostly through human activities such as poaching, settlement and livestock grazing leads to human-lion conflict as lions replace their natural prey base with livestock. For instance, an incursion by a lion pride in 2007 from Mozambique, into Nyanga National Park, which has a low prey density, resulted in the lions mauling and killing eight horses which

were used by the Parks Authority for conducting horse rides, in addition to killing livestock in settled areas, surrounding the park.

Habitat Loss

In Zimbabwe the threat to lions from habitat loss exists in the Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by an increasing human and livestock populations surrounding these areas. In these areas, habitat loss, reduction in prey populations and killing of problem lions are the major threats to long term lion survival.

Due to the large size of the protected area system in the Zambezi Valley and North West Matabeleland, threats are limited to lion range which extends into adjacent settled areas. The huge natural prey base in these protected areas, reduced killing of problem animals associated with lions preying on livestock in adjacent settled areas.

Within their range areas, lions dominate the carnivore guild with site-specific competition affecting the distribution and abundance of other large carnivores (cheetahs, Africa wild dogs, hyenas and leopard).

Diseases

Diseases do not appear to be a major issue in Zimbabwe lion population. Recent disease screening reveals an absence of Tuberculosis (TB) and Feline Leukemia (FeLV) in the South Eastern Lowveld. Nine of the sixteen lions sampled for Feline Immunodeficiency Virus (FIV) showed a positive reaction to the test in Hwange National Park. However it is thought that FIV has little clinical effect on lions and this is therefore unlikely to be a threat. FIV is prevalent in many wild populations (Loveridge 2011 pers comm).

4.0 SURVEY METHODOLOGY

The population estimates of African lions in Zimbabwe are determined through carnivore spoor surveys, systematic lion collaring and call-up surveys. With the strategy to maintain the wilderness values of most protected areas, there is low road penetration in the parks estates, however all suitable roads are used as transects, and in areas of suitable substrate, spoor surveys have shown to be an effective and efficient means to assess wildlife

densities (Stander 1998: Fuston et al. 2001; Davidson and Romanach 2007). Patrol reports, field observations by Zimbabwe Parks and Wildlife Management Authority rangers and other sightings by tour operators and tourists also contribute to knowledge of the status of lions in Zimbabwe's protected areas. Between 2006 and 2012 leopard and lion spoor surveys were conducted in the major wildlife areas. The surveyed areas are shown in the map in Figure 4. A total of 28 sites were surveyed between 2006 and 2012. The survey covered the major areas within the lion range in the country. The survey sites covered 48123km^2 **(12% of the country)** and 14 400km of transects.

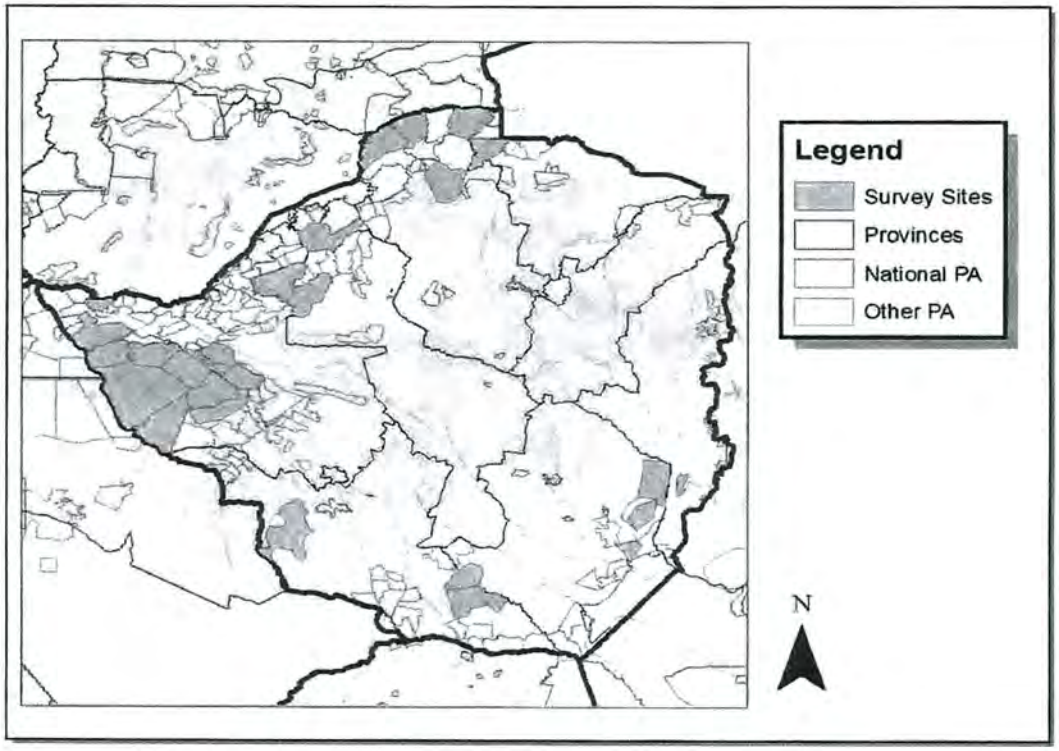


Figure 4: African Lion Survey Sites in Zimbabwe (2012)

Lion population surveys provide useful indices of abundance that can be used to determine spatial distribution, as well as temporal trends in population numbers. Different survey methods are conducted in most of the wildlife estates and areas of minor distribution for purposes of generating information for setting sustainable lion trophy hunting quotas and for population management. In most protected areas, lions compete

for food with other carnivores such as spotted hyenas, leopard and wild dog. Carnivore density information can offer early warnings about conservation needs, and provide information for successful future management as well as offer input for decisions regarding hunting quotas or any management requirement. Moreover, carnivore density trends are a reflection of prey densities and therefore save as useful indicator (Conservation Strategy and Action plan for the Lion (*Panthera leo*) In Zimbabwe, 2006).

5.0 POPULATION ESTIMATES

The lion population estimate at national level ranges from 1700 to 2043 animals (Chardonnet 2002, Bauer and Van Der Merwe 2004) (Table 1). The current lion population estimate for the Hwange Matetsi complex is 750, South Eastern Lowveld 350, between 150-175 in the Save Valley Conservancy, 59 in Gonarezhou National Park, 37 in Malilangwe and 400 animals in Bubye Valley Conservancy. The Mid Zambezi Valley comprising of Matusadonha and Mana Pools National Parks, Charara, Chewore and Sapi Safari Areas has a current population estimate of 600 lions (Zimbabwe Parks and Wildlife Management Authority Reports 2011). The current lion population estimates in the minor range areas are also significant.

Table 1: Lion Population Estimates (Bauer & Van Der Merwe, 2004, Chardonnet, 2002)

		Bauer & Van Der Merwe (2004)			Chardonnet (2002)		
Area	**Sq km's**	**Estimated population**	**Estimated minimum**	**Estimated maximum**	**Estimated population**	**Estimated minimum**	**Estimated maximum**
Charara Safari Area	2207	40	24	56			
Chete/Sijarira	1530	40	24	56			
Chewore Safari Area	2704	100	60	140			
Chirisa Safari Area	1788	60	24	56			
Chizarira National Park	1878	60	36	84			
Dande Safari Area	988	50	30	70			
Doma Safari Area	1933	35	21	49			

Gonarezhou/Save Chiredzi/Malilangwe/ Beitbridge/Tuli	5200	130	91	169	188	130	245
Hurungwe Safari Area	2606	80	48	112			
Hwange Ecosystem	25000	120	72	168	543	434	652
Matetsi Safari Area	10349	60	36	84	150	120	180
Mana Pools National Park	14400	97	83	112	495	396	594
Matusadona National Park	1392	120	90	150	310	248	372
Sapi Safari Area		40	24	56			
Zambezi National Park	865	25	15	35			
Totals	72 840	1057	678	1397	1686	1328	2043

6.0 POPULATION DENSITIES

Table 2 shows the current lion population estimates and densities in the Hwange-Matetsi ecosystem. The 12 year average density in the Hwange National Park is 2.8 lions per 100km^2 (2000-2011) with the population fluctuating over this time. This estimate is based on spoor transects and detailed population estimates and on individual recognition of animals in an intensively studied population.

Table 2: Results of lion population surveys of lions in the North West Matabeleland (Hwange Lion Research, 2014)

	Density	Area (km2)	Estimated number of lions	Year of survey
Hwange NP	3.75	14900	559	2013
Matetsi Units 1-5	3.04	1934	59	2008

Matetsi Units 6-7 and Zambezi NP	2.98	1585	47	2013
Ngamo & Sikumi Forest	0.45	1386	6	2008
Gwaai Conservancy	2.40	927	22	2007
Hwange Communal Land (Mvutu & Shana area)	0.61	392	2	2012
Tsholotsho buffer adjacent HNP	0.54	1275	7	2010-11
Chizarira NP	0.83	1948	16	2012
Chirisa SA	0.00	1713	0	2012
Matusadonha NP	2.17	1427	31	2013
TOTAL Lion Estimate			**750**	

The South Eastern Lowveld has a lion population density of about 6 lions per 100km^2 in the Save Valley Conservancy, 9 lions per 100 km^2 in Malilangwe and 0.8 lions per 100 km^2 in the Gonarezhou National Park (Zimbabwe Parks and Wildlife Management Authority Annual Report, 2013) (Figure 5).

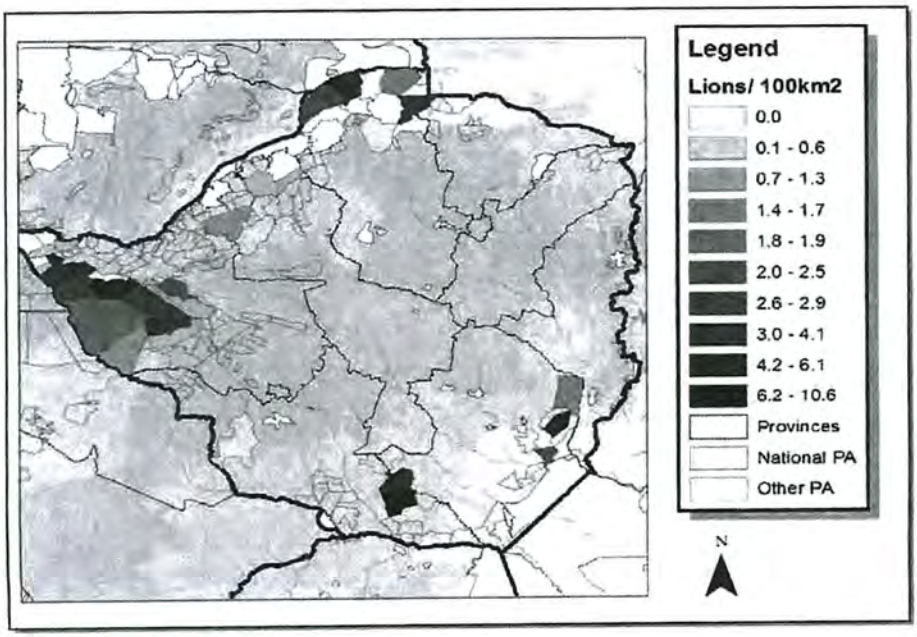


Figure 5: Lion densities in Zimbabwe (Leopard and Lion Spoor Survey Report, 2012).

The Matetsi-Kazuma-Zambezi complex to the North West of Hwange (4935km^2; composed of Deka and Matetsi Safari Areas, Kazuma and Zambezi National Parks and Kazuma and Pandamasuie Forests) is estimated to have a population of 222 lions based on a density of 4.5 lions per 100km^2. This estimate is extrapolated from a spoor survey of 1600km^2 area of the Matetsi-Kazuma-Zambezi complex in 2007. Table 3 shows lion population estimates and densities in selected survey sites in the Zambezi Valley and surrounding areas from the spoor survey done between 2011 and 2012. Table 4 shows the population estimates for Gonarezhou National Park in 2013.

Table 3: Population estimates and lion densities in selected survey sites in the Zambezi Valley (Hwange Lion Research, 2014)

Survey Site	Density/ 100km^2	Area (km^2)	Estimated number	Year of Survey
Omay	0.28	1865	5	2012
Chewore North	1.92	1648	32	2012
Dande	1.83	1155	21	2012
Hurungwe (Nyakasanga & Rifa)	1.89	1709	32	2011
Mana Pools	4.52	1287	58	2011
Hurungwe Mukwichi CAMPFIRE Area	0	1853	0	2011

Table 4: Population estimates from call up survey for Gonarezhou National Park (Lion Call Up Survey, 2013)

Parameter	Northern GNP	Southern GNP	Total
Area (km^2)	1665	2121	3786
Combined transect length (km)	229.8	301.8	531.6
Penetration ratio	1:7.25	1:7.03	1:7.12
Results			
Number of Individual lion spoor seen	22	5	27
Lion spoor frequency (km/spoor)	10.45	60.36	19.69
Spoor density (spoor/100km)	9.57	1.66	5.08
Density of lions per $100km^2$ (Y=0.3049X)	2.9	0.5	1.5
Estimated number of lions	48	11	59

7.0 POPULATION TRENDS

In Zimbabwe, trends in the population estimates of African lions show a growing

population trend. The average lion densities in most protected areas are also showing an increasing trend. For example in Gonarezhou National Park as shown in Table 5, an estimate of 24 lions was established in 2009 and by 2013 the population had grown by 150% to an estimated 60 individuals within a period of 4 years. Other areas within other protected areas with similar management regimes are also reflecting similar trends in population estimates.

Table 5: African Lion population estimates for Gonarezhou National Park (2009 to 2013) (Annual Report, 2013)

Species	2009	2010	2011	2012	2013
Lion	24	34	55	49	59

Bubye Valley Conservancy is a closed protected are system with a large resident lion population. Figure 6 shows the trend in lion population growth for the Conservancy from the time of introduction of lions into the property in 1999 to present. Bubye valley conservancy has the highest lion density of 14 lions per 100km^2.

Population trends of lions in Bubye Valley Conservancy

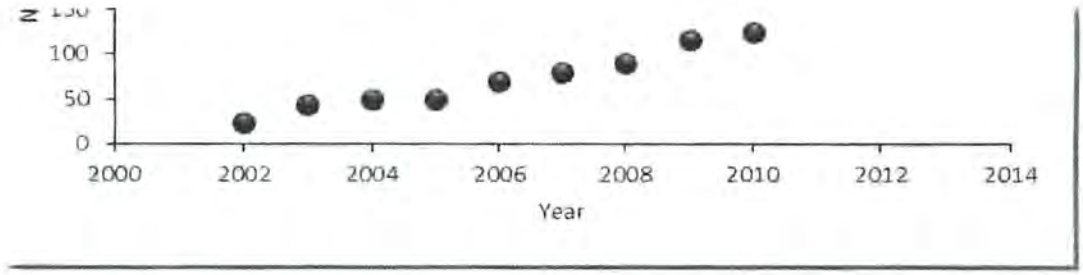


Figure 6: Trends in lion population for Bubye Valley Conservancy (Lion Report, 2014)

8.0 LEGAL UTILIZATION OF LIONS

8.1 Annual Trophy Quotas

Lions are used for consumptive and non-consumptive purposes. The main uses are trophy sport hunting, photographic safaris and educational purposes in captive breeding operations. Table 8 shows national annual lion trophy quotas for different broad land use types. The quotas set for trophy hunting are declining from 114 in 2004 to 89 in 2014 as part of adaptive management of the lions.

Table 8: National Annual Lion Trophy Quotas (ZPWMA Utilisation Unit, 2014)

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Parks	36	30	34	30	29	25	26	29	31	36	38
Communal	58	45	43	34	35	38	34	33	31	24	26
Forestry	9	8	3	3	3	3	3	4	4	4	4
Private	11	15	22	26	25	24	19	20	17	21	21
Totals	**114**	**98**	**102**	**93**	**92**	**90**	**82**	**86**	**83**	**85**	**89**

8.2 Quota Setting

African lions are one of the most sought after species by international hunting clients and are key for the viability of the trophy hunting industry. However, during recent years there has been increasing awareness of the negative impacts associated with lion hunting on lion populations in some areas, including in Zimbabwe. However, research has also demonstrated that lion hunting can be sustainable if quotas are established in a

scientific manner, and that lion populations are able to recover quickly from over-harvest if the pressure on them is removed.

8.2.1 The Quota Setting Process

For the African lion, a specific Hunt Return Form was introduced in 2013 hunting season. On this Hunt Return Form, key variables are recorded such as trophy quality, hunting success and hunting effort. Photos of all lion trophies are also included on the Hunt Return Form and are used to determine the age of the lion trophy. A Points System is being used to determine the 2015 Sport Hunting Quotas for African lions in Zimbabwe (Table 9)

Table 9: Proposed points system for lion age restrictions and quota setting in Zimbabwe

	≥6 years	No trophy	5 years	4-4.9 Years	<4 years	Failure to submit hunt return/incomplete hunt returns
For quotas of 3 or more	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Quota setting process	These points are added up and divided by 3 to yield the quota for next year					

The new Points System will restrict hunting to old males. Hunters are recommended to hunt mature males that are older than 5 years old. Latest scientific evidence suggests that if harvesting of lions is restricted to animals of 5-6 years or older, the impact of trophy hunting on the species population is likely to be minimal (Whitman et al. 2007).. By age 5 or 6, the lion has a chance to sire at least one litter. Restricting offtakes to older lions also increases the net number of lions that can be harvested over time.

In the Points System, operators would be penalized if they hunted animals less than 5 years old by not getting an approval for a lion quota on the same property for the

subsequent hunting season. If however, the operator hunts a lion older than 6 years, they would be rewarded through an increased quota of the same species in the subsequent hunting season.

Lion aging will be conducted through different aging characteristics including: the degree of facial scarring; teeth colour and degree of wear; mane development (particularly regarding the shape around the ear and the mohawk); and through post mortem analysis of the width of the pulp cavity of the second premolar (which becomes narrower with age).

Field-based training on aging techniques has already been conducted for the Zimbabwe Parks and Wildlife Management Authority and Safari Operators. Specialized training manuals including Field Guides have also been developed.

8.2.2 Monitoring of quota utilization and trade data

- Approved quota are issued to local authority/landowner
- Quotas are utilized by contracted Safari Operators
- Monitoring at the local level is carried out by community game guards and wildlife monitors
- The Zimbabwe Parks and Wildlife Authority undertakes monitoring programmes at the national level including monitoring of biological and trade information on the species, environmental and other data. The Authority also ensures compliance with wildlife laws and regulations.
- A Hunt Return Form is completed for each hunt by the safari operator and local authority and is submitted to the Zimbabwe Parks and Wildlife Management Authority,
- The Hunt Return Form allows key variables to be captured for input into national database and provides further datasets for subsequent quota setting exercises

9.0 ILLEGAL TRADE IN LIONS AND THEIR PRODUCTS

Illegal trade in lions and their products is very insignificant. There are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. Anyone found in possession of illegally acquired lion specimens pays a fine of USD5000 or faces a mandatory jail sentence. In On conviction for lion poaching, courts may ask the convict to pay compensation fee of US**$20 000.** Some illegal off takes occur when lions are accidentally killed through snares or chemical poisoning meant for herbivores. Other cases involve retaliatory killing of lions as a result of livestock predation outside protected areas.

10.0 HUMAN AND LION CONFLICT MANAGEMENT

The lion is a flagship species and powerful symbol of Africa, and yet living with lions poses hardships for many communities. In some areas, the lion is a major predator on domestic livestock, leading to profound conflicts with local herders.

Table 10 Human and Lion Conflict (2009 to 2011) (CAMPFIRE Association, 2012)

District	Total incidents	People Injured	People Killed	Livestock killed
Hurungwe	5	2	2	1
Chiredzi	25	0	0	136
Mbire	5	0	5	7
Binga	9	0	0	39
Total	**44**	**2**	7	**183**

11.0 MANAGEMENT INITIATIVES AND CONTROL MEASURES WITH REGARD TO LION CONSERVATION

11.1 Conservation strategy and action plan for the lion (*Panthera leo*) in Zimbabwe

Zimbabwe is one of the few lion range states in Africa, where large areas of land which have been set aside as protected areas, still have viable lion populations. In some parts of Africa, lions have been completely wiped out through uncontrolled hunting, revenge killings, habitat loss and other factors with the only record to indicate their existence in the past now left as anecdotal evidence. The conflict with local communities and the threat to livestock and human lives in many parts of the world including Zimbabwe is well documented. While its attraction in ecotourism as one of the most beautiful and graceful cats, and as a trophy animal in sport hunting, its economic benefits are huge. Its social and cultural values are an integral part of the Zimbabwean lifestyle, therefore efforts to ensure lion conservation need to be strengthened.

The Zimbabwe Conservation Strategy and Action Plan for the Lion will guide the conservation and management of this important top predator. The strategy and action plan is the outcome of a workshop in which stakeholders representing the wildlife industry, technocrats, inter and non-governmental organizations, wildlife producers etc, actively participated.

11. 2 Law enforcement efforts being implemented in Zimbabwe with regard to lion conservation

- Intensive anti-poaching efforts by Parks rangers throughout the country.
- Joint investigative operations based on intelligence between the Zimbabwe Parks and Wildlife Management Authority other law-enforcement agencies like the police and the army.
- Joint Field Anti-poaching by the Zimbabwe Republic Police and Parks Rangers on Private game farms and Conservancies and on Stateland.

- Border Control – Trade compliance officers at ports of exit and entry who monitor and enforce compliance together with Customs Officials, Immigration and the Zimbabwe Republic Police.
- Information led deployment
- Problem animal control by Zimbabwe Parks and Wildlife Management Authority- Management Division (Anti poaching Rangers) in the communal areas and Natural Resource Monitors in Rural District Councils
- Harvesting controls: sustainable quotas, hunting permits and hunt monitoring and Tourism Return Forms (TR2).
- Trade controls: Issuing of CITES Export and Import Permits following recommendations based on non-detriment findings by the Scientific Authority.

12.0 LEGAL FRAMEWORK GOVERNING LION CONSERVATION

Zimbabwe's National Legislation is very comprehensive to ensure long term survival of the African Lion. Zimbabwe has a full range of national legislative and administrative measures needed to effectively implement all aspects of the Convention on Trade In Endangered Species of wild flora and fauna (CITES) and related Resolutions and Decisions of the Conference of Parties. Zimbabwe's legislation is in Category 1 of CITES and therefore meets all the requirements of CITES implementation.

The African Lion is a specially protected species whose conservation is regulated through a policy and legal framework and regulations which include:

- Parks and Wildlife Act; Chapter 20:14 (1996) as amended in 2001
- Environmental Management Act; Chapter 20:27
- Forest Act; Chapter 19:05
- Statutory Instrument 362 of 1990 : Parks and Wildlife (General) Regulations, 1990

- Statutory Instrument 76 of 1998 :Import and Export of Wildlife Products
- Statutory Instrument 40 of 1994 : Parks and Wildlife Act (General) Amendments
- Statutory Instrument 26 of 1998: Parks & Wildlife Act (General) Amendment
- Statutory Instrument 92 of 2009; Compensation Values for Wildlife
- Statutory Instrument 93 of 2009; Compensation Values for Trapping of Animals
- Trapping of Animals Control Act 20.16
- Licensing and Protection of wildlife properties
- Conservation Strategy and Action Plan for Lion (*Panthera leo*) in Zimbabwe (2006). Prepared following a Workshop. 30-31 October 2006. Harare.
- Tourism Hunt Return Forms (TR2)
- Code of Ethics for Hunting in Zimbabwe

Parks and Wild Life Act Chapter 20:14 of 1996 as amended in 2001

It is the Principal legislation which governs and regulates the purchasing, selling and exporting of parts and derivates including live animals. It also protects the gazetted protected areas which form the major range and habitat for the African lion.

The Act prohibits the hunting of any animal and removal of parts of animals from any land without authority. The Act provides for the protection of animals in the following designated areas, National Parks, Parks and Wild life Estates, Parks and Wild life land, Sanctuaries and Safari Areas.

The Act further provides for categorization of animals into protected and specially protected animals. Of particular interest to lion conservation is Part XII of the Act which prohibits the hunting, removal and sale of live animals and animal products from designated national parks.

The Act has the following provisions which address issues related to Control of live animals, trophies and trade;

- Section 59 provides for the general protection of all wildlife which is not covered by the above categories.

This Act empowers the Minister responsible for the Parks and Wild Life to issue regulations governing certain activities such as-:

- Section 60 where the Minister may prohibit or restrict hunting and removal of animals in defined areas.
- Section 66 provides for the licensing of professional hunters who undertake legalized hunting safaris.
- Section 72 provides for the sale of animals born or hatched and held in captivity.
- Section 73 provides for the sale and manufacture of articles from trophies.

Environmental Management Act Chapter 20:27 Of 2006
This Act provides for the sustainable management of natural resources and protection of the environment. The Act also provides for the preparation of National Environmental Plans for the management and protection of the environment in Zimbabwe.

Forest Act Chapter 19:05
This Act provides for the establishment of a commission, to control, manage and protect of State forests as well as private forests thus providing a secure habitat for lions and other wildlife species.

Statutory Instrument 362 Of 1990
This legislation provides in sections 66-75 for the Regulation of Manufacture, Processing and Dealing in trophies.

Statutory Instrument 76 Of 1998
Statutory Instrument number 76 of 1998, Parks and Wild Life (Import and Export) (Wild Life) Regulations specifically deals with Import and Export of wildlife products. This legislation was enacted to ensure compliance with CITES requirements for export and import of wild flora and fauna. These provide for the following-:

- Section 3 deals with the Control of Import and Export of wild life and trophies.

The above section lays down a general prohibition on the import into or export from Zimbabwe of any "wild life" or trophy of "wild life" except in accordance with either a certificate issued in terms of section 5 by the Director or Director of Customs, or an open general permit:

- Section 5 deals with Permits and Certificates and is consistent with CITES legislation.

- Section 15 deals with Offences and Penalties.

Any person who contravenes any of the provisions of subsection 1 shall be guilty of an offence, and liable to a fine or imprisonment. To effectively ensure compliance, the Zimbabwe Parks and Wildlife Management Authority deployed a permanent team of officers based at all ports of exit and entry to assist border control officials in monitoring and inspection of all wildlife exports.

Statutory Instrument 26 Of 1998
The regulations provides for the monitoring of all hunting activities in the country to ensure compliance by all Safari Operators and international clients and to ensure that the TR2 Form. (Tourism Hunting Return Form) is duly completed.

Trapping Of Animals (Control) Act Chapter 20:21
The Act provides for the control, restriction and regulation of the construction, possession and use of certain traps for the purpose of trapping animals; to control the sale and disposal of certain animals, to include lions and to provide for matters incidental to or connected with the foregoing.

Statutory Instrument 92 Of 1992
Parks and Wild Life (Payment for Hunting of Animals and Fish) Notice, 2009
This instrument provides for compensation values of various wildlife forms to include animals and fish. It acts as an additional deterrent measure in matters where poaching cases are being dealt with in accordance with the law. The compensation value for illegal hunting of lion is USD 5 000, 00.

Statutory Instrument 93 Of 2009
Parks and Wild Life (Payment for Trapping of Wild Animals) Notice, 2009
This instrument provides for the payment of compensation to the state or game owners in the event that one is convicted for illegally trapping wild animals on various land categories. The compensation value for illegal hunting of lion is USD 5 000, 00.

Statutory Instrument 40 Of 1994
Parks and Wildlife (Appropriate Authorities for Communal Land) Notice, 1994, resulted in the according of Appropriate Authority status to various Rural District Councils. This legislation devolved authority to Rural District Councils and gave rights to local communities to sustainable utilize wildlife and other natural resources in their areas of jurisdiction.

New Draft Statutory Instrument
A draft Statutory Instrument, Parks and Wildlife (Inspection, Registration and Licensing of Wildlife Properties) Regulations is currently under consideration in the Office of The Attorney General. This legislation will assist the Zimbabwe Parks Management Authority to adequately monitor the activities of private property owners whose premises have wildlife.

Code of Hunting Ethics for Zimbabwe

A Code of Ethics for Hunting in Zimbabwe is in place which regulates all forms of hunting including all lion hunts.

REFERENCES

Bauer, H and Van Der Merwe, S 2004. Inventory of free ranging lion *Panthera leo* in Africa. *Oryx* 38(1), 26-31

Chardonnet, Ph (ed) 2002. Conservation of the African lion. Contribution to a status survey. International Foundation for the Care of Wildlife, France, conservation force, USA, 177pp

Conservation Strategy and Action plan for the Lion (*Panthera leo*) In Zimbabwe – Prepared following a workshop 30-31 October 2006, Harare.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Save Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Grinnell, J., Packer, C. & Pusey, A. E. 1995. Cooperation in male lions: kinship, reciprocity or mutualism? Animal Behaviour, 49, 95–105.

Groom R. J, Funston P.J, & Mandisodza R (2014) Surveys f Lions (*Panthera leo*) in Zimbabwe yielding disturbing results: What is driving the population collapse? Fauna And Flora International, Oryx, 1 of 9

McComb, K., Packer, C.&Pusey, A. (1994). Roaring and numerical assessment in contests between groups of female lions. Anim. Behav. 47: 379–387.

Packer, C., Scheel, D. & Pusey, A. E. 1990. Why lions form groups: food is not enough. American Naturalist, 121, 716–728.

Pusey, A. E. & Packer, C. (1987). The evolution of sex-biased dispersal in lions. Behavior 101: 275–310.

Pusey, A. E. & Packer, C. (1987). The evolution of sex-biased dispersal in lions. Behavior 101: 275–310.

Stander, P.E. (1998). Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. J. Appl. Ecol. 35, 378–385.

Whitman K & Packer C (1997). The effect of sport hunting on social organisation of the African lion (*Panthera leo*). Proceedings of a symposium on lions and leopards as game ranch animals. Onderstepoort, October 1997.

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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August 21, 2019

RCVD SEP 6 2019

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

RE: PRT No. MA74840C/ Lion Trophy/ Zimbabwe/ Justin Ragazzine

Dear Chief Cogliano:

This document and the attached materials are supplement to our existing lion trophy import application for Justin Ragazzine, PRT No. 74840C. We have the following information to add.

The lion in question was harvested on November 27, 2017 . The lion was taken from the Savé Valley Conservancy. The GPS Coordinates are 022 696.

The current location of the Trophy: Trophy Consultants International, 4 Josiah Chinamano Road, Belmont, Bulawayo, Zimbabwe

Attached is a copy of the Zimbabwe Hunting permit. Please note the original dates on the hunting permit were: 11/28/2017 – 12/7/2017 and were changed to: 11/26/2017 to 12/7/2017.

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

Sincerely,

John J. Jackson III

Encl: Copy of Zimbabwe Hunting permit

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

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 21 November 2017

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Passing Cloud Safaris who have applied for permit to hunt 1 x lion with client Justin Micheal Ragazzine the following property:

- Chishakwe in Save Valley Conservancy Masvingo Province. **Note that the client wants to change the dates from 28 November 2017 - 7 December 2017. The new dates are 26 November 2017 – 7 December 2017.**

The hunt will be under the guidance of professional hunter Johan Bezuidenhout PH license #27.

Kindly find attached application from the operator and copies of 2017 hunting permit and quota.

Recommended/ Not Recommended..... 24/11/17

Investigation and Security Manager **Date**

Approved/ Not Approved: 21/11/17

Head Management Services **Date**

Parks and Wildlife Management Authority
MANAGEMENT SERVICES CONSUMPTIVE
21 NOV 2017
HEAD OFFICE
P. O. BOX CY 140, CAUSEWAY, HARARE
TEL (04) 707 [illegible]

Dates of hunting changed to 26/11/17 – 07/12/17 to Chishakwe & Matengalere Ranches

M. MUTANDWA / AREA MANAGER

No. 001542

PHL:
PHL 08
Amount Paid$400
Date 28/12/16
Receipt No. 880915

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [CHAPTER 20:14]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [Chapter 20:14],

to Chishakwe

of Save Valley Conservancey

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section Chishakwe-Save Valley Conservancy of the Masvingo Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01/01/2017 and 31-12-17 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
Baboon	30		Geese	15		Jackal B/B	4	
Buffalo (m)	9		Genet	3		Klipspringer (m)	4	
Bushbuck (m)	3		Giraffe (m)	3		Kudu (m)	8	
Bushpig	8		Grysbok (m)	2		Leopard (m)	2	
Civet	2		Guinea Fowl	20		Lion (m)	1	
Crocodile	2		Hare	4		Mongoose	2	
Duiker (m)	5		Honey Badger	3		Monkey (m)	4	
Eland (m	6		Hyaena (Spotted)	2		Nyala (m)	1	
Elephant (m)	1		Hyrax	30		Pegions/ Doves	100	
Francolin	30		Impala (m)	30		Porcupine	5	

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the list.

(b) (6)

for and on behalf of the Director and Wildlife Management Authority

(Designation .....)

for Finance Manager

for and on behalf of the Director General, Parks and Wildlife Management Authority

(Designation DIRECTOR GENERAL)

Date stamp of authority which issued the permit

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 14:35:13 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 14:14:02 -04'00'

To: Permit File PRT- 74840C

Enhancement Finding

Applicant: Justin Michael Ragazzine (PRT–74840C)

Introduction

Justin Michael Ragazzine submitted an application on January 30, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken on November 27, 2017, from the Savé Valley Conservancy (SVC), Chishakwe Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

Hunting, Management, and Utilization of Lions

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Justin Michael Ragazzine hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Ragazzine's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Ragazzine himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Ragazzine supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Ragazzine, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Ragazzine in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Ragazzine's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Ragazzine's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Ragazzine's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Ragazzine, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Ragazzine's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Ragazzine submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Ragazzine plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Ragazzine's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Ragazzine's permit request, we find that the expertise, facilities, or other resources available to Mr. Ragazzine appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Ragazzine's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Ragazzine's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Ragazzine on November 27, 2017, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Justin Michael Ragazzine of Youngstown, Ohio.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / jan/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:21:26 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 74840C, Justin Michael Ragazzine, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

Signature: AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 14:36:05 -04'00' Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA74840C-0

Effective: 08/13/2020 Expires: 08/12/2021

Issuing Office:

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

AMY BRISENDINE

Digitally signed by AMY BRISENDINE
Date: 2020.08.13 16:20:35 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JUSTIN MICHAEL RAGAZZINE
(b) (6) [redacted]
YOUNGSTOWN, OH 44511
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

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

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

Federal Fish and Wildlife Permit Application Form

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

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

Threatened-listed lion

LB

RCVD DEC 08 2017

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
TAYLOR	CHRISTOPHER	EDWARD	MR

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Berthold	ND	58718	Ward	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Berthold	ND	58718	Ward	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US76241B/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible] any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

[illegible]ble for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 11/27/17

Please continue to next page

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

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

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera. leo. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Bubye Valley Conservancy, Masvingo Province, Zimbabwe

   b. Date wildlife is to be hunted:

      Between the 21st May 2018 and the 7th June 2018

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

      Skin (Life size mount including claws) and the skull

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

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

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

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

Name:	
Business Name:	TROPHY CONSULTANTS INTERNATIONAL
Address:	4 JOSIAH CHINAMANO ROAD
Address:	BELMONT
City:	BULAWAYO
State/Province:	
Country, Postal Code:	ZIMBABWE

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

Please see information provided by Conservation Force, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

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

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

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

Taxidermist/Broker's signature: N/A Date: _____

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

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

Applicant's signature: (b) (6) Date: 11/27/17

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

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

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

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

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

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

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

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

Barry , Anna <anna_barry@fws.gov>

Christopher T aylor PRT #66783C

1 message

Barry , Anna <anna_barry@fws.gov> Thu, Mar 1, 2018 at 2:50 PM
To: "John J. Jackson, III" <jjj@conservationforce.org>

Received, thanks.

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT You may have noticed that our application forms expired 5/31/2017 . The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Thu, Mar 1, 2018 at 2:25 PM, John J. Jackson, III <jjj@conservationforce.org> wrote:

> Hi Anna,
>
> Conservation Force is representing Chris Taylor. His PRT is #66783C. On his permit application the original hunt was between May-June 2018. The hunt will now take place from October 4 through October 23, 2018.
>
> Please update his application accordingly.
>
> Thanks,
>
> John
>
> --
>
> Conservation Force
> 3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
> Telephone: (504) 837-1233 • Fax: (504) 837-1145
> jjj@conservationforce.org • www.conservationforce.org

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M
SHANE MAHONEY
RENEE SNIDER

December 5, 2019

TRANSMISSION VIA EMAIL: mary_cogliano@fws.gov
Department of the Interior
U.S. Fish and Wildlife Service
Chief Mary Cogliano, Ph.D.
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: SUPPLEMENT TO APPLICATION TO IMPORT A SPORT-HUNTED TROPHY
APPLICANT NAME: CHRISTOPHER E. TAYLOR **PRT #:** 66783C
COUNTRY: Zimbabwe

Dear Chief Cogliano:

We are hereby submitting a supplement to an application because the hunt was completed successfully. and the original application omitted the second lioness.

SPECIE:	African Lion	**DATE HARVESTED:**	October 8, 2018
SPECIE:	African Lioness	**DATE HARVESTED:**	October 11, 2018
OPERATOR:	Martin Nel Safaris [http://martinnelsafaris.com/]		
CONSERVANCY:	Bubye Valley Conservancy [www.bubyevalleyconservation.com]		

Attached please find signed Notice of Representation, Zimbabwe Parks and Wildlife Management Authority to Process Special Permit for Hunting, Zimbabwe Hunting Return Form – TRAS2, Zimbabwe Lion Conservation Research Report 2016 – Sport-Hunting and Lion *Panthera Leo* Conservation in Zimbabwe, Conservation Force – The Importance of Lion Hunting in Zimbabwe, History of Bubye Valley Conservancy, Lion Research Programme by Bubye Valley Wildlife Conservation, Bubye Valley Conservancy Motivation for the Hunting of Adult Lionesses, Zimbabwe Parks and Wildlife Management Authority Hunting Permit to Lemco-Mazunga Safaris of Bubye Valley number 001696, dated December 27, 2017, and number 001902, dated August 10, 2018; 2018 Offtake Quotas for Alienated Land, and History of Bubye Valley Conservancy.

If you have any questions, please do not hesitate to contact us.

Sincerely,

John J. Jackson

JJJ/ecs
Cc: Applicant, Mr. Christopher E. Taylor, *via email: hlsupply@srt.com*
Operator, Mr. Martin Nel, *via email: martinnelsafaris@hotmail.com*
Enclosures:

a. Notice of Representation,
b. Zimbabwe Parks and Wildlife Management Authority to Process Special Permit for Hunting,
c. Zimbabwe Hunting Return Form – TRAS2,
d. Zimbabwe Lion Conservation Research Report 2016 – Sport-Hunting and Lion *Panthera Leo* Conservation in Zimbabwe,
e. Conservation Force – The Importance of Lion Hunting in Zimbabwe,
f. History of Bubye Valley Conservancy,
g. Lion Research Programme by Bubye Valley Wildlife Conservation,
h. Bubye Valley Conservancy Motivation for the Hunting of Adult Lionesses,
i. Zimbabwe Parks and Wildlife Management Authority Hunting Permit to Lemco-Mazunga Safaris of Bubye Valley number 001696, dated December 27, 2017, and number 001902, dated August 10, 2018;
j. 2018 Offtake Quotas for Alienated Land, and History of Bubye Valley Conservancy

NOTICE OF REPRESENTATION

This is a notice to the U.S. FISH AND WILDLIFE SERVICE that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a permit to import a threatened-listed PANTHERA LEO MELANOCHAITE [African Lion] trophy from ZIMBABWE.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

Signed: (b) (6)

Name: CHRISTOPHER EDWARD TAYLOR

Date: 10-25-19

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 01 October 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Mazunga Safaris who have applied for permit to hunt 1 x lion and 1 x lioness with client **Christopher Edward Taylor** in the following property:

- Bubye Valley Conservancy in Beitbridge District Matebeleland South Province **from 5 October 2018 to 22 October 2018.**

The hunt will be under the guidance of professional hunter M Nel PH license number 264.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~..... 02/10/18

Investigation and Security Manager **Date**

Approved/~~Not Approved~~..... 02/10/18

Head Management Services **Date**

For and on behalf of the Director General

Parks and Wildlife Management Authority
MANAGEMENT SERVICES CONSUMPTIVE
02 OCT 2018
HEAD OFFICE
P O BOX CY 140 CAUSEWAY HARARE
TEL: 263 4 792783 9

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

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

0000081213
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Mazunga Safaris (Pvt) Ltd	**Client's Full Name**	CHRISTOPHER EDWARD TAYLOR
ZTA (HOP) No.	HOP0062	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	Bubye Valley Conservancy 8 Norfolk Road P O Box 9169, Hillside, Bulawayo	**Address**	(b) (6) BERTHOLD, NORTH DAKOTA, 58718, U S A
Name of Professional Hunter	M NEL	**Licence No.**	264
Telephone		**Fax**	NIL
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	**Address**	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	**Address**	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent	TRACY SAFARI ADVENTURES	**Address**	5424 SUNOL BOULEVARD #10 STE 235, PLEASANTON CA 94566 USA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Bubye Valley Conservancy	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	05-10-2018
Date of Safari To	22-10-2018
Daily Rate Charged For Big Game USD	3,000.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All Inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other Incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	27-SEP-2018	DMS/22456	27-NOV-2018	USD	115,464	5,451
2	03-OCT-2018	DMS/22456	27-NOV-2018	USD	115,464	87,373.02
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	54,000.00	**Total Guests rate**	.00
Less Commission	22,639.99	**Total Trophy fees**	59,200.00
Other fees (Incidentals)	2,264.00	**Grand Total USD**	92,824.02
Percentage Commission Charged	41.93	**Total Processing Fees**	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	IMPALA	M	Killed	Bubye Valley Conservancy	36K 041 098	05-OCT-2018	54	300
2	IMPALA	M	Killed	Bubye Valley Conservancy	36K 932 402	14-OCT-2018	56	300
3	ZEBRA	M	Killed	Bubye Valley Conservancy	36K 251 113	05-OCT-2018	N/A	1,100
4	ZEBRA	F	Killed	Bubye Valley Conservancy	36K 412 088	07-OCT-2018	N/A	1,100
5	ZEBRA	M	Killed	Bubye Valley Conservancy	35K 547 099	06-OCT-2018	N/A	1,100
6	ZEBRA	M	Killed	Bubye Valley Conservancy	35K 280 123	07-OCT-2018	N/A	1,100
7	ZEBRA	M	Killed	Bubye Valley Conservancy	36K 322 203	05-OCT-2018	N/A	1,100
8	BABOON	M	Wounded	Bubye Valley Conservancy	36K 528 141	10-OCT-2018	N/A	50
9	HYENA	M	Killed	Bubye Valley Conservancy	36K 239 113	12-OCT-2018	16	1,500
10	WILDEBEEST	M	Killed	Bubye Valley Conservancy	35K 541 101	12-OCT-2018	83	1,000
11	ELAND	M	Killed	Bubye Valley Conservancy	35K 339 088	14-OCT-2018	91	1,800
12	LION	M	Killed	Bubye Valley Conservancy	35K 998 091	08-OCT-2018	25	42,000
13	LION	F	Killed	Bubye Valley Conservancy	36K 941 128	11-OCT-2018	N/A	6,000
14	WARTHOG	M	Killed	Bubye Valley Conservancy	36K 095 078	09-OCT-2018	32	600
15	JACKAL	M	Killed	Bubye Valley Conservancy	36K 573 140	14-OCT-2018	N/A	150
16								
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Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez[†1], Dr Rosemary Groom[‡2], Olivia Mufute[§3] and Roseline Mandisodza-Chikerema[¶3]

[1]Bubye Valley Conservation Research Initiative
[2]African Wildlife Conservation Fund
[3]Zimbabwe Parks and Wildlife Management Authority

January 31, 2016

BUBYE VALLEY CONSERVATION RESEARCH
ZIMBABWE

† byron.d dupreez@gmail.com
‡ rosemary@africanwildlifeconservationfund.org
§ omufute@zimparks.co.zw
¶ mandisodzar@gmail.com

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

i – Banning of all lioness hunting in Zimbabwe

ii – Hunting moratoria around the Gonarezhou and Hwange National Parks

iii – Removal of fixed hunting quotas

iv – Age restrictions on sport-hunted lions

v – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land

ii – Lion sport-hunting generates up to US$ 557 km^{-2}

iii – Anti-poaching (in particular that of rhinoceroses) costs ~US$ 216 km^{-2}

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

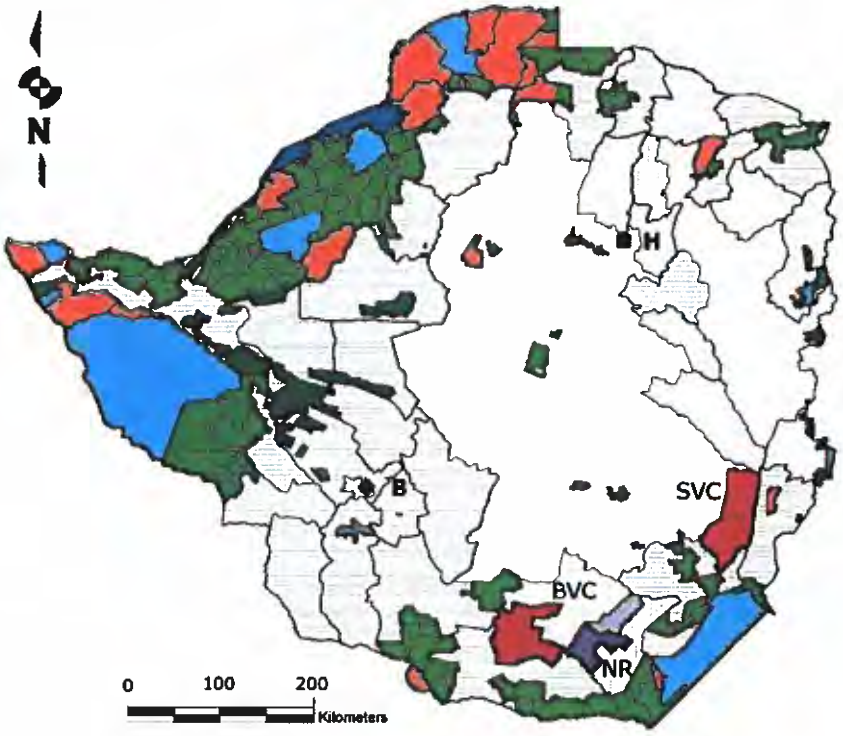

Figure 3: Map of Zimbabwe's main wildlife areas: [*i*] National Parks are represented in light blue; [*ii*] Safari areas are represented in orange; [*iii*] Forestry areas are represented in dark green; [*iv*] Community and Private wildlife areas are represented in light green; [*v*] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [*vi*] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [*vii*] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [*viii*]The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [*ix*] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: *ii, iii, iv, v, vii & viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately \$150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

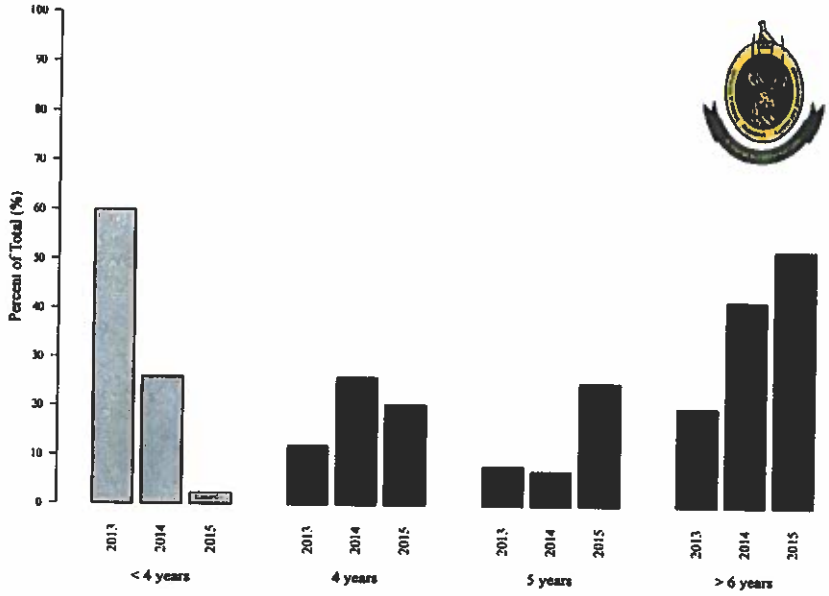

Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

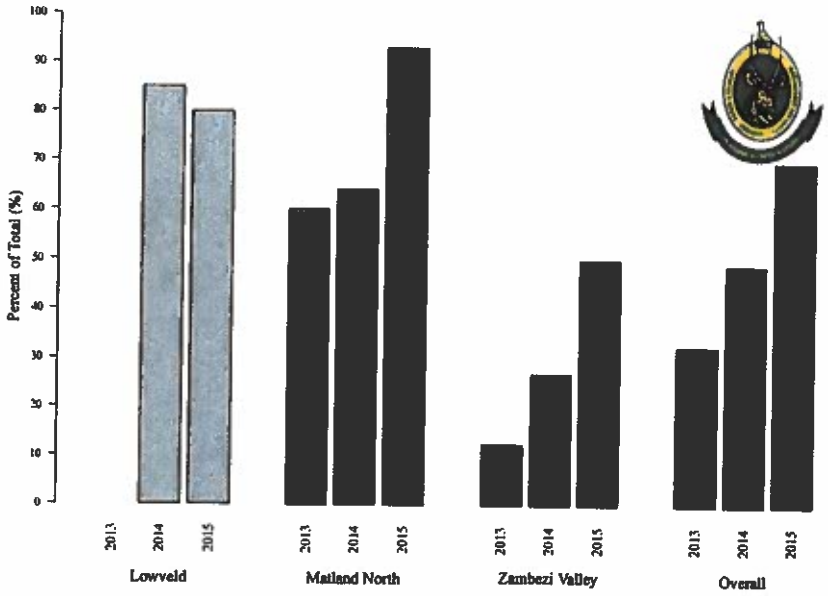

Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

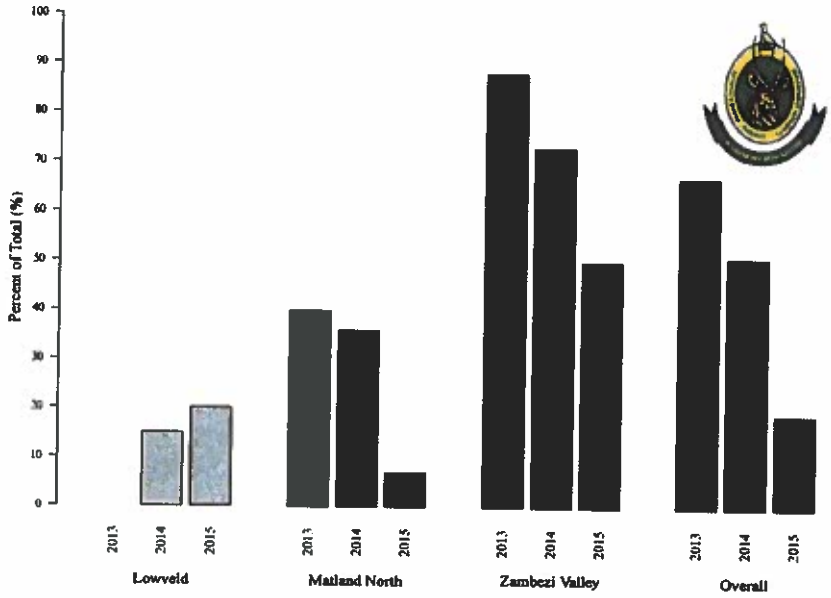

Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total Incidents	Livestock killed	*People Injured*	*People Killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	44	183	*2*	*7*

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (~0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

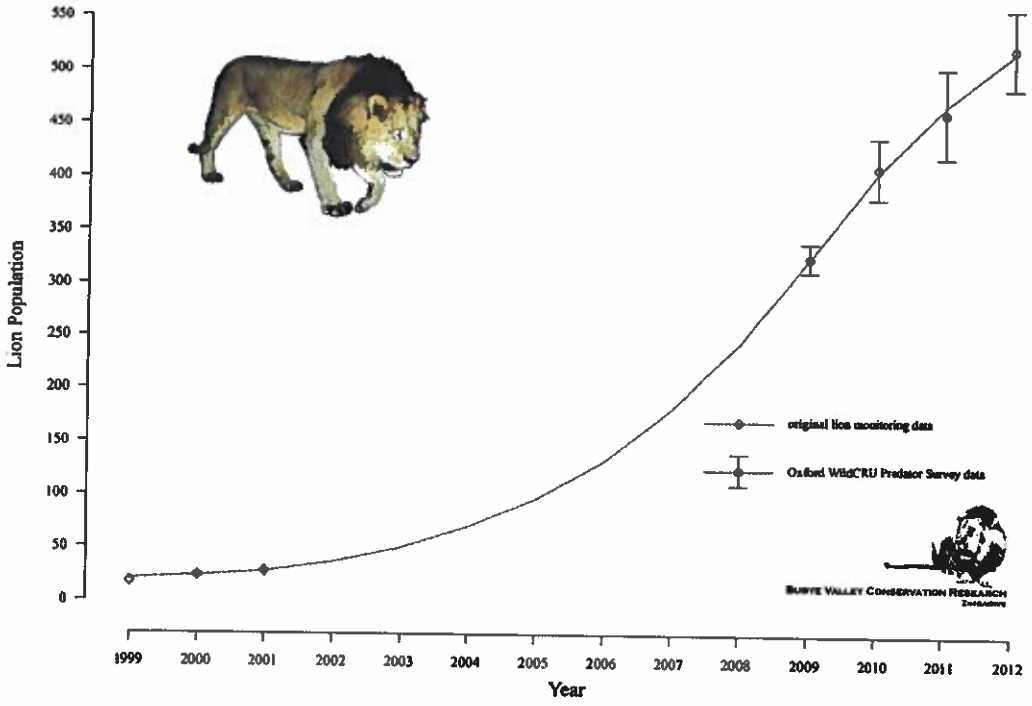

Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site
	- 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makedo Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water*
	- Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.*
	- Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine
	- 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water
	- New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Beit Bridge RDC self funding projects up and running*
	- New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange
	- Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Beit Bridge & Mwenezi districts*
	- 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs and local headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations*
	- 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014
	- 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports*
	- Transport the soccer teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions*
	- 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC*
	- 2m security fencing supplied to Penemene School
	- Second hand door and window frames donated to Mapiri school (ex Mazunga School)
	- 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b/holes in the Vumhani area are done by BVC*
	- 26 bags of cement were donated to Mgaladivha School
	- Fencing donated to the Mgaladivha School
	- Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole
	- Water supply to Mielezi Clinic
	- 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project*
	- 60 bags cement donated to the Welkom for repairs to a dam wall
	- 6 loads of riversand and 20 cement donated to Vumani Preschool
	- Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School
	- Supply of 24 loads of riversand to Mdzwiti School (value $1200)
	- All roofing materials supplied to Mdzwiti School
	- Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

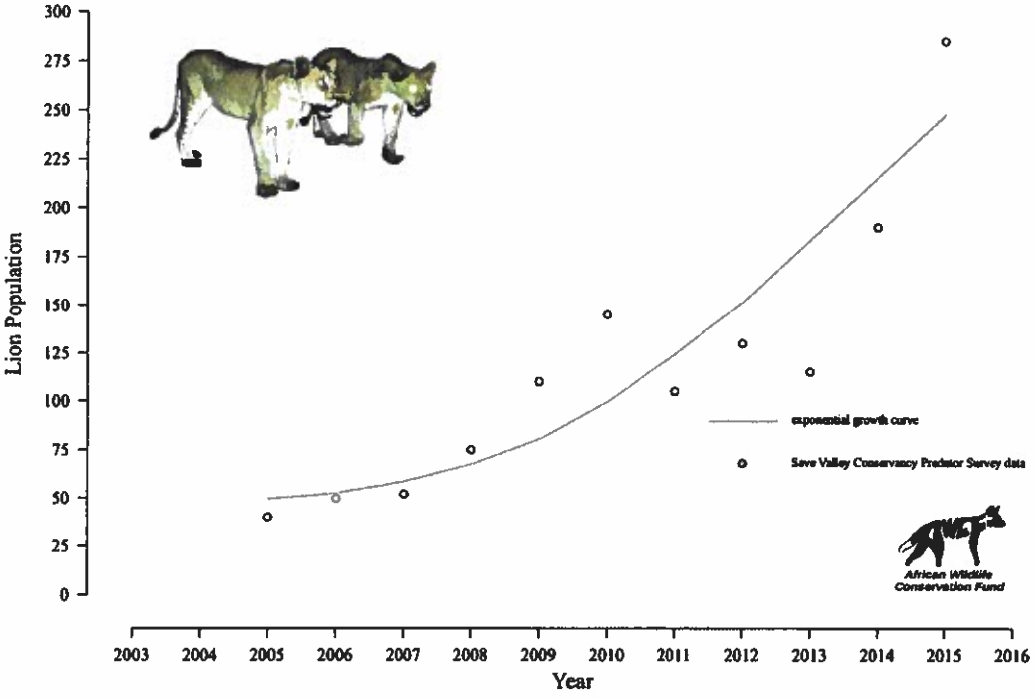

Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

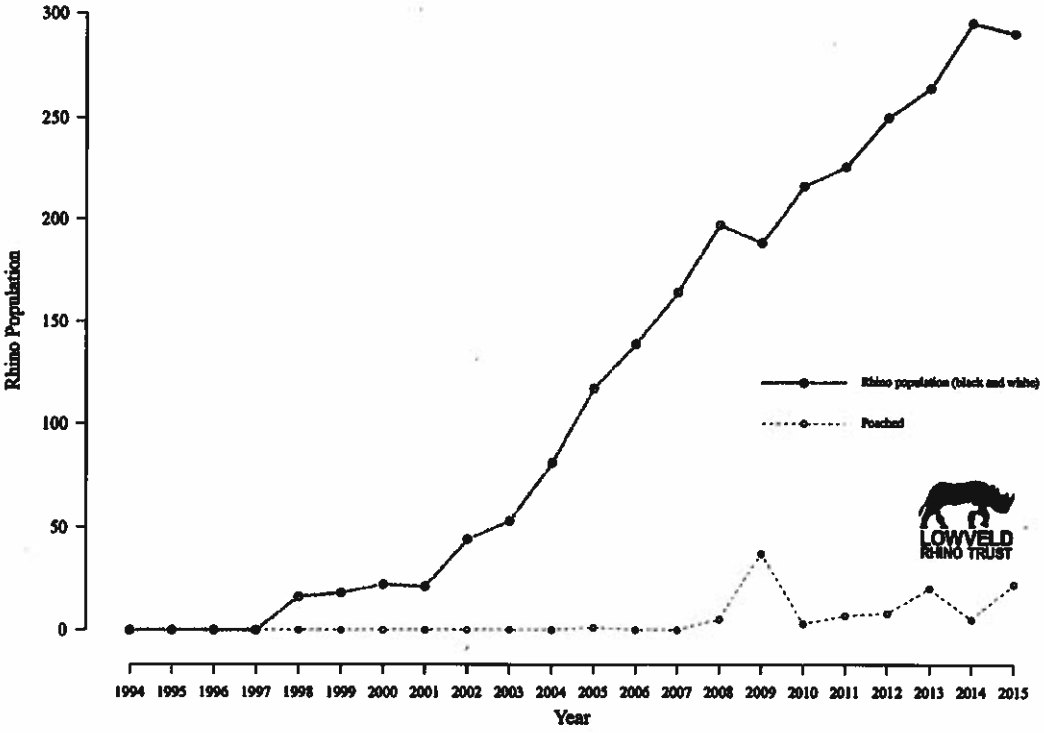

Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration: 18 days [*total daily rate of US$ 53,100 lion hunt^{-1}*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion hunt^{-1}*]

BUBYE VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 year^{-1}), research (approximately US$ 34,700 year^{-1} not including client and sponsor donations), and community support assistance (approximately US$ 210,000 year^{-1}).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZP-WMA, and that the research assists ZP-WMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

REFERENCES

Barnett, R., Yamaguchi, N., Shapiro, B., Ho, S.Y., Barnes, I., Sabin, R., Werdelin, L., Cuisin, J., Larson, G., 2014. Revealing the maternal demographic history of Panthera leo using ancient DNA and a spatially explicit genealogical analysis. Bmc Evolutionary Biology 14.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L., Macdonald, D., Packer, C., 2015a. Lion (Panthera leo) populations are declining rapidly across Africa, except in intensively managed areas. Proceedings of the National Academy of Sciences of the United States of America-Biological Sciences 10.

Bauer, H., Packer, C., Funston, P.F., Henschel, P., Nowell, K., 2015b. Panthera leo. The IUCN Red List of Threatened Species 2015.

Bauer, H., Van Der Merwe, S., 2004. Inventory of free-ranging lions Panthera leo in Africa. Oryx 38, 26-31.

Becker, M., McRobb, R., Watson, F., Droge, E., Kanyembo, B., Murdoch, J., Kakumbi, C., 2013. Evaluating wire-snare poaching trends and the impacts of by-catch on elephants and large carnivores. Biological Conservation 158, 26-36.

Bond, I., 1993. The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe.

Brassine, M.C., Parker, D.M., 2012. Does the presence of large predators affect the diet of a mesopredator? African Journal of Ecology 50, 243-246.

Child, B., 1988. The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

Child, B., 1993. Using wildlife as a development tool in Zimbabwe.

Creel, S., 2001. Four factors modifying the effect of competition on carnivore population dynamics as illustrated by African wild dogs. Conservation Biology 15, 271-274.

Creel, S., Creel, N.M., 1996. Limitation of African wild dogs by competition with larger carnivores. Conservation Biology 10, 526-538.

Creel, S., Creel, N.M., 1997. Lion density and population structure in the Selous Game Reserve: Evaluation of hunting quotas and offtake. African Journal of Ecology 35, 83-93.

Cumming, D.H.M., 1993. Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Davidson, Z., 2009. Lion ecology and socio-spatial impacts of trophy hunting in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Preez, B., Hart, T., Loveridge, A.J., Macdonald, D.W., 2015. Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

du Preez, B.D., 2014. The impact of intraguild competition with lion Panthera leo on leopard Panthera pardus behavioural ecology. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Toit, R., 1989. Proposal for Savé Valley Conservancy. Unpublished report for the Intensive Conservation Areas Committee, October 1989, Harare, Zimbabwe

Durant, S.M., 1998. Competition refuges and coexistence: an example from Serengeti carnivores. Journal of Animal Ecology 67, 370-386.

Durant, S.M., 2000. Living with the enemy: avoidance of hyenas and lions by cheetahs in the Serengeti. Behavioral Ecology 11, 624-632.

Funston, P.J., 2008. Conservation and management of lions in Southern Africa: status, threats, utilization and the restoration option, In Management and conservation of large carnivores

in West and Central Africa. eds B. Croes, H.H. Delongh, H. Bauer, pp. 109-131. Leiden, Institute of Environmental Sciences.

Funston, P.J., 2011. The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy.

Funston, P.J., Groom, R.J., Lindsey, P.A., 2013. Insights into the Management of Large Carnivores for Profitable Wildlife-Based Land Uses in African Savannas. Plos One 8.

Groom, R.J., P., W.J., 2015. Carnivore densities in the Savé Valley Conservancy: 2015. Report for the Savé Valley Conservancy.

Hayward, M.W., O'Brein, J., Kerley, G.I.H., 2007. Carrying capacity of large African predators: predictions and tests. Biological Conservation 139, 219-229.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Rickelton, M., Walker, C., Slotow, R., Skinner, J.D., 2007. Restoring lions Panthera leo to northern KwaZulu-Natal, South Africa: short-term biological and technical success but equivocal long-term conservation. Oryx 41, 196-204.

IUCN, 2006. Conservation strategy for the lion in eastern and southern Africa. IUCN SSC Cat Specialist Group, Gland, Switzerland and Cambridge, UK.

IUCN, 2015. The IUCN Red List of Threatened Species. Version 2015-4.

Jansen, D.J., Child, B., Bond, I., 1992. Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe.

Kettles, R., Slotow, R., 2009. Management of free-ranging lions on an enclosed game reserve. South African Journal of Wildlife Research 39, 23-33.

Laurenson, M.K., Wielebnowski, N., Caro, T.M., 1995. Extrinsic Factors and Juvenile Mortality in Cheetahs. Conservation Biology 9, 1329-1331.

Leader-Williams, N., Milledge, S., Adcock, K., Brooks, M., Conway, A., Knight, M., Mainka, S., Martin, E.B., Teferi, T., 2005. Trophy hunting of black rhino Diceros bicornis: Proposals to ensure is future sustainability. Journal of International Wildlife Law & Policy and Politics 8, 1-11.

Lindsey, P., du Toit, R., Pole, A., Romanach, S., 2008. Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

Lindsey, P.A., Alexander, R., Frank, L.G., Mathieson, A., Romanach, S.S., 2006. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based land uses may not be viable. Animal Conservation 9, 283-291.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Balme, G.A., Funston, P.J., Henschel, P.H., Hunter, L.T.B., 2015. Life after Cecil: channelling global outrage into funding for conservation in Africa. Conservation Letters 0, 1-6.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Romanach, S.S., Davies-Mostert, H.T., 2009. The importance of conservancies for enhancing the value of game ranch land for large mammal conservation in southern Africa. Journal of Zoology 277, 99-105.

Lindsey, P.A., Romanach, S.S., Tambling, C.J., Chartier, K., Groom, R., 2011. Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx 45, 96-111.

Lindsey, P.A., Roulet, P.A., Romanach, S.S., 2007. Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa. Biological Conservation 134, 455-469.

Loveridge, A.J., Searle, A.W., Murindagomo, F., Macdonald, D.W., 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation 134, 548-558.

Macdonald, D.W., Loveridge, A.J., Nowell, K., 2010. Dramatis personae: an introduction to the wild felids, In Biology and Conservation of Wild Felids. eds D.W. Macdonald, A.J. Loveridge, pp. 3-58. Oxford University Press Inc., New York, United States.

Miller, S.M., Funston, P.J., 2014. Rapid growth rates of lion (Panthera leo) populations in small, fenced reserves in South Africa: a management dilemma. South African Journal of Wildlife Research 43, 1-13.

Mills, M.G.L., 1995. Notes on wild dog Lycaon pictus and lion Panthera leo population trends during a drought in the Kruger National Park. Koedoe 38, 95-99.

Mosser, A., Packer, C., 2009. Group territoriality and the benefits of sociality in the African lion, Panthera leo. Animal Behaviour 78, 359-370.

Nowell, K., Jackson, P., 1996. Leopard, Panthera pardus, In Wild Cats: Status Survey and Conservation Action Plan. p. 406. IUCN, Switzerland.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., Caro, T., 2010. Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology 25, 142-153.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., Nowell, K., 2009. Sport Hunting, Predator Control and Conservation of Large Carnivores. Plos One 4.

Packer, C., Loveridge, A., Canney, S., Caro, T., Garnett, S.T., Pfeifer, M., Zander, K.K., Swanson, A., MacNulty, D., Balme, G., Bauer, H., Begg, C.M., Begg, K.S., Bhalla, S., Bissett, C., Bodasing, T., Brink, H., Burger, A., Burton, A.C., Clegg, B., Dell, S., Delsink, A., Dickerson, T., Dloniak, S.M., Druce, D., Frank, L., Funston, P., Gichohi, N., Groom, R., Hanekom, C., Heath, B., Hunter, L., DeIongh, H.H., Joubert, C.J., Kasiki, S.M., Kissui, B., Knocker, W., Leathem, B., Lindsey, P.A., Maclennan, S.D., McNutt, J.W., Miller, S.M., Naylor, S., Nel, P., Ng'weno, C., Nicholls, K., Ogutu, J.O., Okot-Omoya, E., Patterson, B.D., Plumptre, A., Salerno, J., Skinner, K., Slotow, R., Sogbohossou, E.A., Stratford, K.J., Winterbach, C., Winterbach, H., Polasky, S., 2013. Conserving large carnivores: dollars and fence. Ecol Lett 16, 635-641.

Pole, A., 1999. The behaviour and ecology of African wild dogs, Lycaon pictus, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland.

Pusey, A.E., Packer, C., 1987. The Evolution of Sex-Biased Dispersal in Lions. Behaviour 101, 275-310.

Schaller, G.B., 1972. The Serengeti Lion: A Study of Predator-Prey Relations. University of Chicago Press.

Smuts, G.L., 1978. Effects of Population Reduction on Travels and Reproduction of Lions in Kruger National Park. Carnivore 1, 61 - 72.

Spong, G., 2002. Space use in lions, Panthera leo, in the Selous Game Reserve: social and ecological factors. Behavioral Ecology and Sociobiology 52, 303-307.

Suzuki, Y., 2001. Drifting Rhinos and Fluid Properties: The Turn to Wildlife Production in Western Zimbabwe. Journal of Agrarian Change 1, 600-625.

Trinkel, M., Funston, P., Hofmeyr, M., Hofmeyr, D., Dell, S., Packer, C., Slotow, R., 2010. Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13, 374-382.

Vucetich, J.A., Creel, S., 1999. Ecological interactions, social organization, and extinction risk in African wild dogs. Conservation Biology 13, 1172-1182.

Wegge, P., Odden, M., Pokharel, C.P., Storaas, T., 2009. Predator-prey relationships and responses of ungulates and their predators to the establishment of protected areas: A case study of tigers, leopards and their prey in Bardia National Park, Nepal. Biological Conservation 142, 189-202.

Whitman, K., Starfield, A.M., Quadling, H.S., Packer, C., 2004. Sustainable trophy hunting of African lions. Nature 428, 175-178.

Williams, P.H., Burgess, N.D., Rahbek, C., 2000. Flagship species, ecological complementary and conserving the diversity of mammals and birds in sub-Saharan Africa (vol 3, part 3, pg 258, 2000). Animal Conservation 3, 365-365.

ZPWMA, 2015. Conservation Status of the African Lion (Panthera leo) in Zimbabwe. Unpublished Report for the USFWS.

CONSERVATION FORCE

THE IMPORTANCE OF LION HUNTING IN ZIMBABWE

Media outlets are reporting that "Xanda," a six-year-old African lion and the alleged "son" of "Cecil," was recently killed in a lawful tourist hunt in northwestern Zimbabwe. The reports are inconsistent and biased. Most of all, they ignore the critical conservation role that regulated hunting plays in Zimbabwe. The facts below emphasize the importance of licensed, regulated lion hunting as a conservation tool in Zimbabwe and lion range states.

Habitat Security: Regulated hunting in Zimbabwe takes place in government safari areas and forest areas, communal areas in the CAMPFIRE program, and private conservancies. Hunting justifies the protection of nearly five times as much habitat as in National Parks (>130,000 km^2 compared to <28,000 km^2).

Zimbabwe is not alone. Hunting areas are more than five times the size of Tanzania's National Parks, more than 2.8 times the size of Zambia's National Parks, more than 2.5 times the size of South Africa's National and Provincial Parks, and more than 1.5 times the size of Mozambique's National Parks. Hunting mitigates the habitat loss identified as the single greatest threat to large carnivores like lion and leopard. It provides habitat for other game and essential lion prey.

Wildlife Authority Revenue: Regulated hunting contributes significant operating revenues to the wildlife authorities of range states like Zimbabwe. These revenues pay for law enforcement, monitoring, and other conservation activities. Hunting fees in Zimbabwe cover most of the authority's operating expense. Under the current quota, lion fees alone can underwrite the protection of over 18,000 km^2, two-thirds the size of the National Parks. In other African countries, hunting fees make up between 30% and 80% of the wildlife authority's operating budget.

Anti-Poaching: Many hunting operators maintain their own anti-poaching teams to support government enforcement efforts. This spreads the costs of law enforcement between the public and private sectors, and reduces the burden on under-resourced governments. According to a study of 18 hunting operators in Zimbabwe, 26% of company staff were engaged in law enforcement. Similarly, a study of 27 operators in Tanzania found they spent over $6.7 million in anti-poaching from 2013 to 2015 and patrolled more than 7,170 days in that period.

Community Tolerance: Regulated hunting increases the tolerance of rural communities living side-by-side with dangerous game like lion by generating tangible benefits, which improve community livelihoods. The CAMPFIRE program in Zimbabwe devolves control of wildlife on communal lands to rural district councils. These councils contract with safari operators and benefit from the fees paid for lion, elephant, and other hunts. At least 55% of these fees are deposited directly in village bank accounts. Another 41% goes to the district councils for community services.

Communities receive other benefits, such as consolation payments, infrastructure project funding, game meat distributions, and employment. This system creates value for species that otherwise face retaliation because they prey upon livestock (e.g., lion and leopard) or raid crops (e.g., elephant and buffalo). (Given these benefits, traditional leaders (chiefs) and CAMPFIRE representatives have spoken out against import restrictions on hunting trophies and calls to ban hunting by some international NGOs.)

Conclusion: Regulated hunting is essential to Zimbabwe's wildlife management and conservation system. This system is working. A 2016 IUCN *Red List* assessment of African lion concluded that Zimbabwe is one of four range states with an increasing lion population. This is an amazing achievement given Zimbabwe's rapidly growing human population and high human population density (26). Hunting takes place across a wide range of land, and in marginalized areas that are simply not appropriate for photographic tourism. If that land is to remain as habitat, there must an incentive for the rural people who would otherwise use it for farming and livestock. Hunting offtakes are low—only 33 lions hunted in 2016—but the incentives are high. This carefully-designed, sustainable-use based system benefits the lion and people of Zimbabwe.

History of Bubye Valley Conservancy

The Bubye Valley Conservancy- once a legendary cattle ranch, one of the largest in Africa, is situated in southwestern Matabeleland, Zimbabwe. It was originally staked out in the then Southern Rhodesian lowveld in the 1900s by the cattle ranching family of Baron Justus von Liebig, supplier of canned 'bully beef' to World War II armies, and the inventor of the Oxo cube. For decades, the Liebigs Ranch cattle competed with the indigenous wildlife for the nourishing 'sweetveld' grasses upon which they fattened and thrived. Liebigs even hired professional hunters to rid the area of wild herbivores. Liebig's company was succeeded by Lemco and then Unilever, and the ranch continued to raise beef into the late 1980s.

Under the Parks and Wildlife Act of 1975, land owners had been given the control and ownership of the wildlife on their properties. The concept of wildlife ranching was born, helped along with ecological studies that indicated that wildlife would generate higher returns than cattle in these drought-prone areas. Many Lowveld cattle ranchers grouped together with their neighbours to form vast wildlife conservancies, removing their boundary fences, allowing the natural habitat to bounce back and re-stocking the land with indigenous animals. Several famous Conservancies were formed such as the Save Valley, Chiredzi River and the Bubiana Conservancy, which was specifically dedicated to rhino conservation.

In the 1990s, after a series of devastating droughts, the vast Lemco ranch was put up for sale. It was purchased by Charles Davy who motivated a consortium of international investors. The property was re-named after the Bubye river, which runs through it, and converted into a wildlife reserve, sustained by profits to be generated from venison and sport hunting. Davy managed the massive wildlife re-stocking exercise, and over the years the perimeter was secured by thousands of kilometres of electrified fence. A ferociously efficient anti-poaching unit was set up to protect the new Conservancy's animals, including an internationally-monitored population of black and white rhinoceros.

International efforts also participated in restoring this African 'Eden'. The International Rhino Foundation translocated eighty-two black rhinos from unsafe areas to the Bubye Valley Conservancy in order to establish a new breeding population in the reserve. This return of habitat to an endangered species was the largest exercise of its kind anywhere in Africa at the time.

Today, thriving herds live in balance on the open savannah, mopani woodlands and in the dense riverine forests. The diverse habitats found in the Bubye Valley Conservancy now support an astonishing 35 species of wild, free-ranging game animals including the classic Big Five. Protected by the conservancy are countless other smaller species found in a healthy and natural eco-system. The conservancy currently boasts the world's fourth largest black rhino (*Diceros bicornis*) population, Zimbabwe's largest lion population, and a flourishing elephant (*Loxadonta africana*) population.

The **3,740 square kilometer** conservancy (Bigger than Luxembourg) is now sustained by carefully regulated low-density, high-value hunting and donor support from individuals and organisations.

Lion Research Programme

...He is quick, and his power to do harm is enormous, for he can cause death with a stroke of his paw or one grip of his jaws..."
- Guide to Rhodesia, 1914

THE BIG CATS

Lion and leopard are two of Africa's most iconic and charismatic carnivores. As a function of their role at the top of the food chain, they are vital to proper ecosystem functioning and health. However, both of these species are facing global population decline through the effects of burgeoning human population growth, and the resultant persecution and habitat fragmentation.

Approximately half of all habitat available to African lions is currently found in commercial trophy-hunting areas; yet the vast majority of lion studies have been conducted inside core protected areas such as national parks – the need for a comprehensive lion study within trophy-hunting areas has generally been neglected.

Conservation research on these key ecological species was initiated on the Bubye Valley Conservancy in 2009, beginning with simple density estimates calculated by counting animal tracks on dirt roads. Since the project's conception; the scope of the research has grown to include GPS collaring for population monitoring and interaction analyses, camera-trapping to determine population density, demographics and age structure, and activity loggers to help us better understand the behavioural ecology and eco-physiology of these species. The breadth of research has also increased to include habitat and herbivore surveys, which are fundamental to understanding the ecology of any species in a dynamic ecosystem. The research on BVC has so far produced three doctoral projects through the University of Oxford. Byron du Preez completed his study in 2013, which used leopards as a model species to investigate the impact of lions on the behavioural ecology of a competitively subordinate carnivore, and highlighted the conservation implications that could result from uncontrolled lion populations at densities higher than the local system can sustain. In 2015, Paul Trethowan built on this study of lion-leopard conflict on the conservancy, and expanded the research to assess lion behavioural ecology using activity loggers mounted on the collars of study animals. Matt Wijers is currently undertaking the most recent doctoral study, which focuses on testing the application of new technology to the monitoring of large carnivores.

In addition to these projects, the ecology unit at BVC also conducts surveys to assist management of key species on the conservancy. These include an annual lion population survey, herbivore counts and long-term camera trap surveys targeting leopard, lion and hyenas.

Bubye Valley Conservancy
Motivation for the hunting of adult lionesses

Blondie Leathem, General Manager, Bubye Valley Conservancy
Email: mazunga@bvczim.com

The Bubye Valley Conservancy (BVC) is one of largest private wildlife areas in Zimbabwe with a total area of approximately 3400 km². Originally a cattle ranch, the BVC was established in 1994 through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting. In 1999, thirteen lions of Namibian origin were introduced to the conservancy from Pilansberg National Park, South Africa. An additional four animals were recorded to have broken in between 1999 and 2003. With abundant prey and the protection from human-wildlife conflict provided by the electrified perimeter fence, the lion population increased at a rate of 25% per annum reaching an estimated population size of 500 individuals in 2013 (Wijers, 2016). The rapid increase in the lion population has had detrimental effects on prey populations particularly wildebeest, eland and giraffe which have recorded declines exceeding 60% (Wijers & Gush, 2018b).

The lion population explosion observed in the BVC likely emanated from the lack of natural regulatory processes that are known to limit population growth in larger unfenced systems. Miller et al. (2013) suggested that management interventions that are implemented to control population growth in smaller, fenced reserves should aim to mimic the outcomes of natural processes particularly regarding reproductive, survival and dispersal schedules. Given the size of the BVC lion population, it would be logistically and financially unfeasible to alter reproductive schedules using contraceptive methods. Furthermore, contraception has been reported to result in fragmentation of prides into smaller groups and single females which can further impact predator prey dynamics through increased predation (Lehmann et al., 2008; Miller et al., 2013). Options for manipulating survival and dispersal rates include translocation, euthanasia and hunting. Although translocation remains an option for BVC management, previous offers and attempts to move animals have proven this to be an unlikely solution due to highly restrictive government policies as well as the limited number of areas willing to receive lions. Trophy hunting and euthanasia are therefore the only reasonable methods of lion population control for BVC.

Adult female lions represent approximately 44% of the total BVC lion population (Wijers & Gush, 2018a). Although the majority of adult females exist in large, stable prides, several lone individuals have been observed. In addition, GPS collar data and sightings information from single lionesses that have either split from their native prides, or that have never been part of a pride, has shown that these individuals typically remain alone and form smaller groups with their offspring. Removal of lone, non-lactating lionesses has therefore been identified as an important management objective aimed at reducing the overall lion population, recruitment and predation. Hunting of lionesses is a preferable method of removal to euthanasia as the income generated from each hunt will be used to fund the conservancy's lion research and anti-poaching projects which are vital for effective wildlife management and protection. Furthermore, the allocated lioness hunting quota represents only a small fraction (15-20%) of the ideal required management offtake. The hunting of selected lionesses will benefit the conservancy ecologically as well as financially helping to ensure continued sustainable management of BVC's wildlife.

References

Lehmann, M. B., Funston, P. J., Owen, C. R., and Slotow, R. (2008). "Feeding behaviour of lions (Panthera leo) on a small reserve," African J. Wildl. Res., 38, 66–78.

Miller, S. M., Bissett, C., Burger, A., Courtenay, B., Dickerson, T., Druce, D. J., Ferreira, S., et al. (2013). "Management of Reintroduced Lions in Small, Fenced Reserves in South Africa: An Assessment and Guidelines," South African J. Wildl. Res., 43, 138–154.

Wijers, M. (2016). BVC Lion Population Survey 2016. Unpublished report, Bubye Valley Conservancy.

Wijers, M. and Gush, W. (2018a). BVC Lion Call-up Survey Report 2018. Unpublished report, Bubye Valley Conservancy

Wijers, M. and Gush, W. (2018b). BVC Herbivore Population Survey 2018. Unpublished report, Bubye Valley Conservancy

References

Lehmann, M. B., Funston, P. J., Owen, C. R., and Slotow, R. (2008). "Feeding behaviour of lions (Panthera leo) on a small reserve," African J. Wildl. Res., 38, 66–78.

Miller, S. M., Bissett, C., Burger, A., Courtenay, B., Dickerson, T., Druce, D. J., Ferreira, S., et al. (2013). "Management of Reintroduced Lions in Small, Fenced Reserves in South Africa: An Assessment and Guidelines," South African J. Wildl. Res., 43, 138–154.

Wijers, M. (2016). BVC Lion Population Survey 2016. Unpublished report, Bubye Valley Conservancy.

Wijers, M. and Gush, W. (2018a). BVC Lion Call-up Survey Report 2018. Unpublished report, Bubye Valley Conservancy

Wijers, M. and Gush, W. (2018b). BVC Herbivore Population Survey 2018. Unpublished report, Bubye Valley Conservancy

050/001696

NP/CITES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PHL: .....
PHL 01
Amount Paid$4000
Date 12/12/17
Re 1000267

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

HUNTING PERMIT

PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to Lemco-Mazunga Safaris

of Bubye Valley Conservancy

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section Bubye Valley Conservancy of the Mat South

..... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-18

and 31-12-18 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
Waterbuck (m)		80	Warthog (m)		100	Wildcat		30
Baboon		50	Gemsbok (m)		2	Kudu (m)		75
Buffalo (m)		120	Genet Cat		25	Klipspringer		10
Bushbuck (m)		10	Giraffe (m)		55	Leopard (m)		19
Bushpig		40	Guinea fowl		1000	Lion (m)		16
Caracal		3	Francolin		500	Monkey		30
Cheetah (m)		1	Doves		2000	Nyala (m)		15
Civet Cat		30	Honey Badger		40	Porcupine		20
Duiker (m)		15	S. Hyena		40	Sable (m)		10
Eland (m)		80	Impala		750	Serval		3
Elephant (m)		3	Jackal		60	Steenbok (m)		30
Wildbeest (m)		200	Zebra		250	Tsessebe (m)		1

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issue the permit

Parks and Wildlife Management Authority
CONSUMPTIVE SERVICES
27 DEC 2017
HEAD OFFICE

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(Designation) AREA MANAGER

.....
for *Finance Manager*

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*

001902

050.....

NP/CITES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PHL: .....
PHL 321
Amount Paid$250
Date 09/08/18
Rec. H10R076016
Being additional permit permit # 001696 after quota ammendment
(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to Lemco-Mazunga Safaris

of Bubye Valley Conservancy

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section Bubye Valley Conservancy of the Mat South

..... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 09-08-18 and 31-12-18 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
~~Hyena (brown)~~		2	XXXXXXXXXXXXXXXXXXXXXXXXX			XXXXXXXXXXXXXXXXXXXXXXX		
~~Lioness~~		10						
XXXXXXXXXXXXXXXXXXXXXXXXX								
XXXXXXXXXXXXXXXXXXXXXXXXX			XXXXXXXXXXXXXXXXXXXXXXXXX			XXXXXXXXXXXXXXXXXXXXXXX		

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issue the permit

10 AUG 2018

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*
(*Designation* ADMIN)

.....
for *Finance Manager*

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*
(*Designation* DG)

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2018 OFFTAKE QUOTAS FOR ALIENATED LAND

NAME OF PROPERTY: Bubye Valley Conservancy LANDOWNER: Lemco-Masuwa Safaris

SIZE OF PROPERTY (ha): 323 000 PROVINCE: Mat South

DISTRICT: Beitbridge NRCC:

Species	Previous Allocations													2018 Quota
	Owner's Population estimate	ZPWMA population estimate	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017		
Baboon	2000	2000	50	60	60	60(Sixty)	60(Sixty)	60(Sixty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)
Buffalo (m)	5400	2100	45	55	55	55(fifty-five)	40(forty)	75(seventy five)	85(eighty five)	120(one hundred and twenty)	120(one hundred and twenty)	120(one hundred and twenty)	120(one hundred and twenty)	120(one hundred and twenty)
Bushbuck (m)	160	160	5	10	10	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)
Bushpig	800	800	25	40	40	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)
Caracal	100	100	3	3	3	3(three)	3(three)	5(five)	5(five)	3(three)	3(three)	3(three)	3(three)	3(three)
Cheetah (m)	80	80	3	5	5	5(five)	5(five)	5(five)	5(five)	2(two)	1(one)	1(one)	1(one)	1(one)
Civet cat	900	900	15	25	25	25(twenty-five	25(twenty-five	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)
Duiker	500	400	10	10	10	10(ten)	10(ten)	15(fifteen)	15(fifteen)	15(fifteen)	15(fifteen)	15(fifteen)	15(fifteen)	15(fifteen)
Eland (m)	5500	5000	65	85	85	85(eighty-five)	85(eighty-five)	100(hundred)	90(ninety)	90(ninety)	90(ninety)	90(ninety)	90(ninety)	80(eighty)
Elephant (m)	480	200	2	2	2	2(two)	2(two)	4(four)	5(five)	4(four)	3(three)	3(three)	3(three)	3(three)
Gemsbok	200	200	3	8	5	5(five)	5(five)	5(five)	5(five)	2(two)	2(two)	2(two)	2(two)	2(two)
Genet cat	9700	300	10	20	20	20(twenty)	20(twenty)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)
Giraffe (m)	4500	4500	70	75	75	75(seventy-five)	80(eighty)	75(seventy-five)	90(ninety)	90(ninety)	90(ninety)	90(ninety)	60(sixty)	55(fifty five)
Guinea fowl	1000	1000	100	100	100	100(one hundred)	100(one hundred)	1000(one thousand)	1000(one thousand)	1000(one thousand)	1000(one thousand)	1000(one thousand)	1000(one thousand)	1000(one thousand)
Francolin	1000	1000	100	100	100	100(one hundred)	100(one hundred)	500(five hundred)	500(five hundred)	500(five hundred)	500(five hundred)	500(five hundred)	500(five hundred)	500(five hundred)
Doves	1000	1000	100	100	100	100(one hundred)	100(one hundred)	1000(one thousand)	2000(two thousand)	2000(two thousand)	2000(two thousand)	2000(two thousand)	2000(two thousand)	2000(two thousand)
Ducks/Geese	1000	1000	100	100	100	100(one hundred)	100(one hundred)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Honey badger	500	500	30	40	40	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)	40(forty)
Hyena Spotted	400	200	12	16	16	16(sixteen)	0(zero)	10(ten)	15(fifteen)	25(twenty five)	30(thirty)	30(thirty)	30(thirty)	40(forty)
Impala(f)	18000	1500												
Impala(m)			430	550	550	550(five hundred an	550(five hundred a	550(five hundred and fifty)	550(five hundred and fi	600(six hundred)	750(seven hundred and fifty)	750(seven hundred and fifty)	750(seven hundred and fifty)	750(seven hundred and fifty)
Ostrich	50	50	8	8	8	8(eight)	8(eight)	8(eight)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Jackal	3000	3000	50	60	60	60(Sixty)	60(Sixty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	60(fifty)
Kudu(m)	3800	3500	50	75	75	75(seventy-five)	75(seventy-five)	75(seventy-five)	75(seventy-five)	75(seventy-five)	75(seventy-five)	75(seventy-five)	75(seventy-five)	75(seventy-five)
Klipspringer	150	150	5	12	12	12(twelve)	12(twelve)	2(twelve)	12(twelve)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)
Leopard(m)	180	180	15	17	17	17(seventeen)	9(nine)	2(twelve)	14(fourteen)	17(seventeen)	17(seventeen)	19(nineteen)	19(nineteen)	19(nineteen)
Lioness	90	0	0	0	3	3(three)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Lion	60	60	3	3	5	5(five)	3(three)	5(five)	10(ten)	12(twelve)	15(fifteen)	12(twelve)	16(sixteen)	16(sixteen)
Monkey (m)	500	500	15	20	20	20(twenty)	20(twenty)	20(twenty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)
Nyala (m)	750	500	3	8	80	8(eight)	8(eight)	8(eight)	10(ten)	10(ten)	10(ten)	12(twelve)	15(fifteen)	15(fifteen)
Porcupine	600	600	20	25	25	25(twenty-five	25(twenty-five	25(twenty-five	20(twenty)	20(twenty)	20(twenty)	20(twenty)	20(twenty)	20(twenty)
Sable (m)	680	500	15	20	20	15(fifteen)	15(fifteen)	15(fifteen)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)
Serval	100	100	3	5	5	5(five)	5(five)	5(five)	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Steenbok (m)	1500	1500	30	45	45	45(forty-five)	45(forty-five)	45(forty-five)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)
Tsessebe (m)	70	70	2	5	5	5(five)	5(five)	5(five)	2(two)	1(one)	1(one)	1(one)	1(one)	1(one)
Waterbuck(m)	2500	2500	50	70	70	70(seventy)	70(seventy)	70(seventy)	80(eighty)	80(eighty)	80(eighty)	80(eighty)	80(eighty)	80(eighty)
Warthog (m)	7000	7000	120	180	180	180(hundred &eight	180(hundred &eig	180(hundred &eighty)	120(hunderd &twenty)	120(hunderd &twenty)	120(hunderd &twenty)	120(hunderd &twenty)	120(hunderd &twenty)	100(one hunderd)
Wild cat	300	300	20	25	25	25(twenty-five	25(twenty-five	25(twenty-five	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)	30(thirty)
Wildebeest (m)	12000	9000	120	140	140	140(hundred&fort	140(hundred&fo	140(hundred&forty)	250(two hundred & fi	250(two hundred & fifty)	250(two hundred & fifty)	250(two hundred & fifty)	250(two hundred & fifty)	200(two hundred)
Zebra	15000	8000	120	150	150	150(hundred & fi	150(hundred & f	150(hundred & fifty)	250(two hundred & fi	250(two hundred & fifty)	250(two hundred & fifty)	250(two hundred & fifty)	250(two hundred & fifty)	250(two hundred & fifty)

Spatial permit needed for Gemsbok

CHIEF ECOLOGIST

DIRECTOR CONSERVATION

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MINISTER OF TOURISM, HOSPITALITY INDUSTRY AND ENVIRONMENT

BUBYE VALLEY CONSERVANCY (/)

History of Bubye Valley Conservancy

The Bubye Valley Conservancy- once a legendary cattle ranch, one of the largest in Africa, is situated in southwestern Matabeleland, Zimbabwe. It was originally staked out in the then Southern Rhodesian lowveld in the 1900s by the cattle ranching family of Baron Justus von Liebig, supplier of canned 'bully beef' to World War II armies, and the inventor of the Oxo cube. For decades, the Liebigs Ranch cattle competed with the indigenous wildlife for the nourishing 'sweetveld' grasses upon which they fattened and thrived. Liebigs even hired professional hunters to rid the area of wild herbivores. Liebig's company was succeeded by Lemco and then Unilever, and the ranch continued to raise beef into the late 1980s.

Under the Parks and Wildlife Act of 1975, land owners had been given the control and ownership of the wildlife on their properties. The concept of wildlife ranching was born, helped along with ecological studies that indicated that wildlife would generate higher returns than cattle in these drought-prone areas. Many Lowveld cattle ranchers grouped together with their neighbours to form vast wildlife conservancies, removing their boundary fences, allowing the natural habitat to bounce back and re-stocking the land with indigenous animals. Several famous Conservancies were formed such as the Save Valley, Chiredzi River and the Bubiana Conservancy, which was specifically dedicated to rhino conservation.

In the 1990s, after a series of devastating droughts, the vast Lemco ranch was put up for sale. It was purchased by Charles Davy who motivated a consortium of international investors. The property was re-named after the Bubye river, which runs through it, and converted into a wildlife reserve, sustained by profits to be generated from venison and sport hunting. Davy managed the massive wildlife re-stocking exercise, and over the years the perimeter was secured by thousands of kilometres of electrified fence. A ferociously efficient anti-poaching unit was set up to protect the new Conservancy's animals, including an internationally-monitored population of black and white rhinoceros.

International efforts also participated in restoring this African 'Eden'. The

International Rhino Foundation translocated eighty-two black rhinos from unsafe areas to the Bubye Valley Conservancy in order to establish a new breeding population in the reserve. This return of habitat to an endangered species was the largest exercise of its kind anywhere in Africa at the time.

Today, thriving herds live in balance on the open savannah, mopani woodlands and in the dense riverine forests. The diverse habitats found in the Bubye Valley Conservancy now support an astonishing 35 species of wild, free-ranging game animals including the classic Big Five. Protected by the conservancy are countless other smaller species found in a healthy and natural eco-system. The conservancy currently boasts the world's fourth largest black rhino (*Diceros bicornis*) population, Zimbabwe's largest lion population, and a flourishing elephant (*Loxadonta africana*) population.

The **3,740 square kilometre** conservancy (Bigger than Luxembourg) is now sustained by carefully regulated low-density, high-value hunting and donor support from individuals and organisations.

(/what-we-do-bedford)

(/take-action-bedford)

LION CONSERVATION RESEARCH (/WHAT-WE-DO)

Since lions *Panthera leo* were re-introduced to BVC in 1999 the population has grown rapidly. Today BVC is home to approximately 20% of Zimbabwe's lions. This is not just the largest continuous population of lion in Zimbabwe but also the densest. Due to the importance of this population for the species' conservation, and the unique management challenges associated with a large fenced population of lion, a long-term conservation research project was established in 2009. Seventeen lions were initially introduced to BVC in 1999. Ten years later, in 2009, when carnivore population surveys were initiated, the lion abundance was estimated to be at around 280 individuals. It has continued to grow. Today there are estimated to be in excess of 400 lions on BVC, which is the largest population in the country.

Learn More → (/what-we-do)

RHINO CONSERVATION (/ANTIPOACHING)

Black rhinos *Diceros bicornis* were first introduced to BVC in 2002, and the population growth rate was accelerated by continual translocations from other areas that were unable to protect their rhino populations as poaching escalated during the mid 2000's. In the face of the renewed rhino-poaching onslaught in Zimbabwe, only the big privately owned conservancies are able to maintain positive rhino population growth rates.

Learn More → (/antipoaching)

Come see for yourself… (http://bubyevalleyconservancy.com/conservation/)

If you would like to book a safari at the Bubye Valley Conservancy, please contact Tracy Safari Adventures, a registered booking agent:

Contact Tracy at: tracyangelidakis@aol.com

The Bubye Valley Conservancy and Mazunga Safaris are members of the Safari Operators Association of Zimbabwe (SOAZ) (http://www.soaz.net/index.php/safari-operators-2?pid=54&sid=117:Mazunga-Safaris)

www.bubyevalleyconservation.com

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

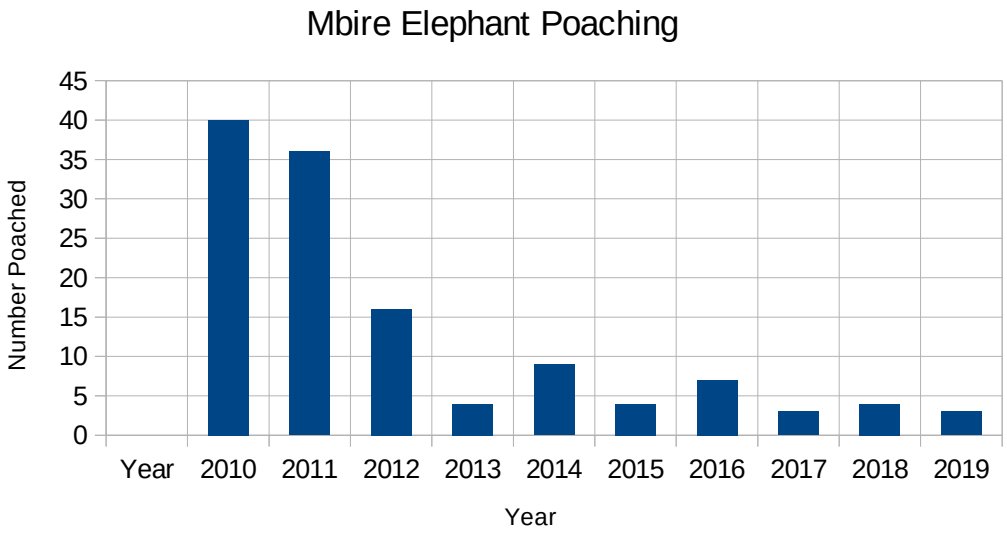

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

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Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE
Date: 2020.08.13 15:16:45 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 66783C

JENNA KING Digitally signed by JENNA KING
Date: 2020.08.13 11:50:14 -04'00'

Enhancement Finding

Applicant: Christopher Edward Taylor (PRT– 66783C)

Introduction

Christopher Edward Taylor submitted an application, received by the Service on December 08, 2017, for the importation of one male lion *(Panthera leo melanochaita)* taken October 08, 2018, from the Bubye Valley Conservancy, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when the import activity qualifies for and the Service issues an ESA threatened-species

enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can

contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. If communities that

share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making ESA enhancement findings for the import of sport-hunted trophies of lions on an

application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

Hunting, Management, and Utilization of Lions

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Christopher Edward Taylor hunted in the Bubye Valley Conservancy (BVC) in Zimbabwe. Based on information submitted with the permit application, the Bubye Valley Conservancy (BVC) is reportedly one of largest private wildlife areas in Zimbabwe with a total area of approximately 3,400 km^2. The land that now occupies BVC was historically a cattle ranch, and in 1994 the BVC was established and land use converted through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting.

In evaluating whether the importation of Mr. Taylor's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Bubye Valley Conservancy and Mr. Taylor himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Save Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species.

Sport hunting was essential for the successful transition of the BVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the

conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over US $100,000 per year. The BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but it is also empowered by job opportunities created both within these communities, as well as in the BVC (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Taylor supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Taylor, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Taylor in the hunting and subsequent import of the trophy lion he harvested in the BVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Taylor's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these

authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Taylor's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Taylor's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Taylor, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, reportedly, USD 590,000 was spent on anti-poaching efforts by BVC alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Taylor's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr.Taylor submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Taylor plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Taylor's trophy lion increases the funds available to the Zimbabwe Government and BVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Taylor's permit request, we find that the expertise, facilities, or other resources available to Mr. Taylor appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Taylor's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Taylor's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Taylor on October 08, 2018, from the Bubye Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Christopher Edward Taylor of Berthold, North Dakota.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The hushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 11, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:12:03 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 66783C, Christopher Edward Taylor, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:17:31 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence _____** **Nonconcurrence _____**

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA66783C-0
Effective: 08/13/2020 Expires: 08/12/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.13 15:41:32 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHRISTOPHER EDWARD TAYLOR
(b) (6) [redacted]
BERTHOLD, ND 58718
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

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

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

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA) Threatened - listed lion

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cater	Paul	David	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Katy	Texas	77493	Waller	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
N/A	N/A	N/A	N/A	N/A

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US691588/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best (b) (6) I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 02/06/2018

Please continue to next page

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

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

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe Save Conservancy

   b. Date wildlife is to be hunted: 6/19/2018 – 7/12/2018

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

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      N/A

   b. Date wildlife was hunted:

      N/A

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

N/A

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

N/A

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

Name: Leon Du Plessis
Business Name: Save Safaris
Address: Box CH 381
Address: Chisipite
City:
State/Province: Harare
Country, Postal Code: Zimbabwe N/A

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

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

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

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

Taxidermist/Broker's signature: N/A Date: N/A

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

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

Applicant's signature: (b) (6) Date: 02/04/2018

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

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

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

N/A

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

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

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

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

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

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] CATER, P - PRT 78387C - SUPPLEMENT APPL IMPORT SPORT-HUNTED TROPHY - LION ZIMB

1 message

Emma C. Sampson <permits@conservationforce.org> Mon, Nov 25, 2019 at 6:14 PM
To: amy_brisendine@fws.gov

Dear Ms. Brisendine:

RE: SUPPLEMENT TO IMPORT APPLICATION OF A SPORT-HUNTED TROPHY - LION - ZIMBABWE
PRT #: 78387C
APPLICANT NAME: PAUL CATER

Please read email below which contains information regarding the funds allocation for the Conservancy.

Attached find the following documents:

1. Zimbabwe Parks and Wildlife Management Authority - Feasibility Study for the Proposed Wildlife Destocking from Sango in Savé Valley Conservancy to Suitable Parks Estate,
2. Letter from SVC to Director General of Zimparks re Proposed Translocation of 600 Elephant from SVC to SAPI, Chizarira and Mavuradhona,
3. Savey Valley Conservancy Press Release re Translocation of Wildlife
4. African Wildlife Conservation Fund and Savé Valley Conservancy - Carnivore Densities in the Savé Valley Conservancy
5. Elephants Translocation

If you have any additional questions, please don't hesitate to contact us.

Kind regards,

Emma

> -------- Forwarded Message --------
> Subject: Fwd: Fish and game questions
> Date: Mon, 25 Nov 2019 09:17:31 -0600
> From: paul Cater (b) (6) >
> To: John J. Jackson, III <jjj@conservationforce.org>
>
> I received this info from Leon DuPlessis with Save Safaris's. This is where I hunted and killed my lion that y'all are working to help me get my permit. I wanted to send this info to y'all to see if it would help my case in any way. Please let me know what you think.
>
> Sent from my iPhone
>
> Begin forwarded message:
>
> > *From:* Leon duPlessis <leon@savesafaris.com>
> >
> > *Date:* November 24, 2019 at 11:23:24 PM CST
> >
> > *To:* Cater paul (b) (6)
> >
> > *Subject:* *Fwd: Fish and game questions*
> >
> > Begin forwarded message:

*From: *Leon duPlessis <leon@savesafaris.com <mailto:leon@savesafaris.com>>

*Subject: **Fish and game questions*

*Date: *25 November 2019 at 7:18:36 AM SAST

*To: *Cater paul (b) (6) <(b) (6)

*Cc: *Cater (b) (6) mailto:p(b) (6) >

Hi Paul

Please see bellow and attached some information that may help with your lion application. If you are able to send this in with a renewed request for them to issue your import permit. To fish and wildlife. I will send a separate email with the questions as bellow. These questions were from fish and wildlife

I hope it helps

All the very best

Leon

Please see as follows

Question A. Is answered by the attached population survey for carnivores in the SVC.

Also attached are Recent documents from SVC and national parks regarding the upcoming translocation of elephant and various other species.

Bear in mind that all of these species are a joint conservancy asset even tho the parks report use one ranch

Question B & C Is answered Bellow

With regards to the revenue generated from this and other hunts conducted within out concession in the Save Valley Conservancy (SVC), these funds are used for the day to day running of the ranch. We employ 30 staff from the surrounding communities to work on anti poaching, wildlife security, general ranch work, making adequate provisions for water , Camp staff etc.

Funds are also generated for use in specific community projects such as dam repairs donations to the local school and clinic to mention a few.

As a member of the SVC we not only do we look after our own concession, we pay levies which go towards the preservation of the whole of the SVC.

We have a large budget in SVC which goes to protect endangered species such as the rhino, wild dog, pangolins etc. This is funded by members, and donations from Tusk, AWF, Save Australia to mention a few.

In 2018 the SVC translocated 100 elephant to Rifa Safari area of Zimbabwe. This coming year we are in negotiations with out National parks department to translocate a further 400 elephant, 40 buffalo, 2 pride of lion to help with overstocking in the SVC and restocking of Zimbabwe National Parks some of which are depleted. The SVC is very well known in conservation circles and can be researched extensively on the internet Save Safaris has Both a web sight and face book page.

Emma C. Sampson

Conservation Permitting Division
CONSERVATION FORCE
3240 S I-10 Service Road W
Suite 200

Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

5 attachments

1. Translocation report Zimparks.pdf
720K

2. SVC to Parks translocation notice.pdf
279K

3. SVC press release proposed relocation of elephants final draft approved.pdf
104K

4. SVC CARNIVORE SPOOR SURVEY REPORT_2018_FINAL.pdf
551K

5. Elephant Translocation (SVC Version).pdf
640K

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

Feasibility Study for the proposed wildlife destocking from Sango in Save Valley Conservancy to suitable Parks Estate

By

D. Madhlamoto

B. Chirombe

August 2019

Introduction

This report has been compiled in response to a proposed destocking of wildlife from Sango in Save Valley Conservancy to suitable and secure National Parks. A proposal has been put forward by Sango to destock and translocate some of the animals to Parks Estate. This proposal was made so as to relieve pressure on vegetation and ensure animal populations are within the ecological carrying capacity of the area. The reason brought forward by the proponent that has initiated the destocking includes;

- The elephant population in Sango has exceeded the ecological carrying capacity leading to vegetation destruction with secondary impacts on other species.
- There are severe droughts being experienced in the conservancy leading to decline in grazing productivity and negatively affecting wildlife populations.
- The amount of rainfall being received on average is below 300mm hence reducing the potential of the area to support excess numbers.
- Carnivores such as lions and wild dogs have increased to the detriment of prey base.

A feasibility assessment was done at Sango to determine the feasibility of the proposed destocking and to assess the veld conditions. Sango is made up of 4 properties and occupies an area of 60 000 hectares (600km²) and is the largest property in the Save Valley Conservancy. The conservancy is made up of over 10 different properties adjoining each other and wildlife moves freely between properties.

Objectives of the assessment

- To assess the veld and range condition of the proposed source area (mainly vegetation condition and grass production).
- To assess the wildlife populations in the proposed source area.
- To review available information and scientific research conducted in Sango which is part of ecological monitoring being carried out.

Large herbivore populations

Animal population in Sango are primarily monitored though aerial surveys and other methods of estimating animal populations such as distance sampling, spoor surveys and camera traps are being conducted as part of population monitoring. Sango conducted an aerial survey in September 2018 and most properties did not participate due to the cost associated with the survey. The aerial survey results conducted in Sango showed an increase in numbers of species such as elephant, giraffe, buffalo, eland, waterbuck, impala, zebra and kudu. The survey showed a decline in wildebeest population. The elephant carrying capacity for Sango should be less than 200 elephants with a density of about 0.2 to 0.3 per km². Currently the density is about 1.15 elephants per km². During the field assessment, noticeable impacts of elephants on their habitats and that of other species were noted in the property. Not only Sango is experience the challenges of overabundance of elephants but also other management units within the conservancy. During a traverse of Sango the following animals were sighted; +1000 impala, giraffe 87, eland 158, kudu 39, zebra 73, wildebeest 54 and warthog 21.

Table 1: Estimates of animal numbers from Aerial Survey conducted in Sango, SVC

Species	**2018 Population estimates**
Buffalo	1042
Zebra	597
Bushpig	116
White rhino	16
Wildebeest	566
Waterbuck	350
Eland	477
Elephant	665
Impala	6360
Warthog	171
Bushbuck	178
Giraffe	518
Kudu	207
Nyala	52

Large carnivore populations

Spoor surveys are conducted annually in Sango to estimate the population of large carnivores together with call-up surveys and camera traps. The survey results shows an increase in lion and wild dog numbers. Lion tracks were noted along the Msaize river bed and, leopard and wild dogs spoors were sighted on some roads.

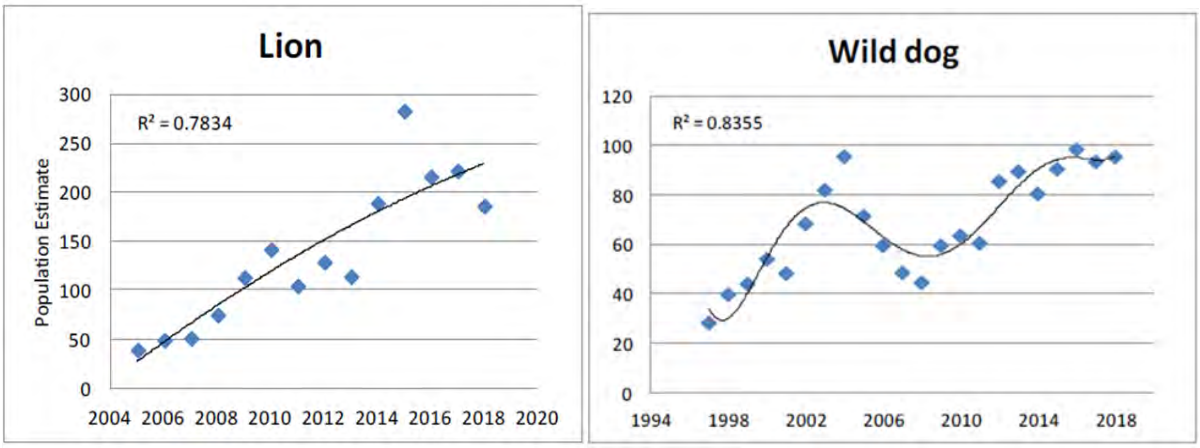

Figure 1: Trends in lions and wild dog numbers

Vegetation condition assessment

Sango has 42 permanent vegetation plots which had been monitored for over 10 years. The assessment team visited some of the plots to assess the damage to vegetation and the range condition. The plots are located in different vegetation communities. The most affected and targeted woodlands by elephants includes the Acacia, Mopane and Riverine. Tree mortalities were frequently noted at *Colophospermum mopane*, baobab *Adsonia digitata,* knob thorn *Acacia nigrescens,* false maruala *Lannea schweinfurthii* and *Acacia tortilis*. The Mopane woodland is being converted to scrub land due to the impacts of elephants. The damage by elephants involve the complete uprooting of a tree leading to creation of bare areas prone to erosion. This has led to a decline in many browsing and grazing units with secondary impacts on species that depend on these woodland and the disappearance of certain tree species. The grass production in most of the areas is very low and cannot support the existing animal populations. Most of high forage value

grass species such as *Panicum maximum* and *Digitaria spp* had been degraded leaving low value species and most areas being invaded by forbs.

Images showing some of the damages to vegetation and decline in graze in Sango

Sango has an estimated 2,520 grazing units, throughout the 7 management vegetation units. The amount of grazing units taken up by the current stocking density far exceeds this carrying capacity. The table and figure below shows that the ecological carrying capacity of Sango has been exceeded and the area is currently overstocked hence the need for destocking.

Table 2: Grazing units in Sango

Species	Offtake number	Grazing units (GU)	Total GU to be removed
Elephant	400	9.8	3,920
Giraffe	70	3.2	224
Zebra	50	1.32	66
Wildebeest	50	1.0	50
Impala	2000	0.3	600
Eland	50	2.0	100
Buffalo	50	2.2	110
		TOTAL	**5,070**

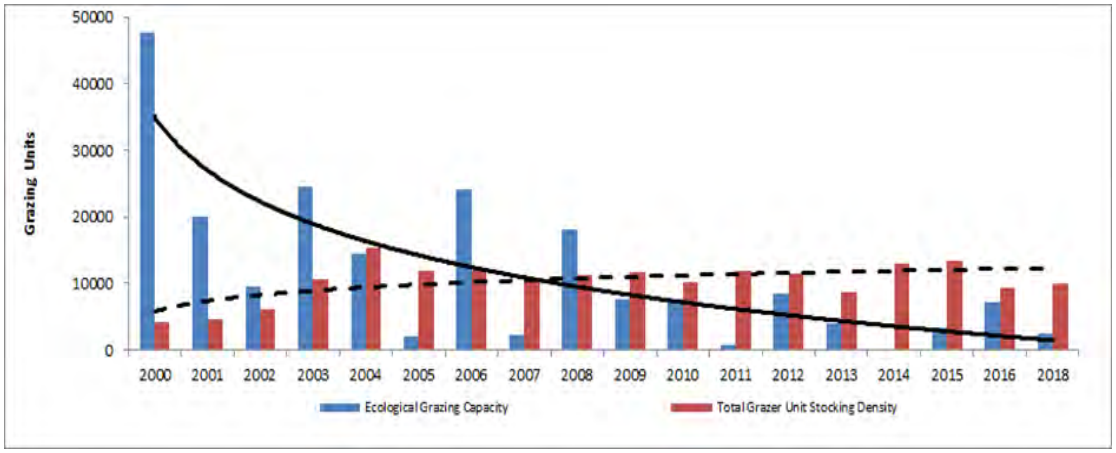

Figure 2: Decline of ecological grazing capacity in Sango

Impacts of drought

The overall rainfall received on an annual basis in the conservancy is less than 400mm. The rainfall received this year in Sango was very low below 200mm. Wildebeest were mostly affected by the recurring droughts leading to a crush in their numbers from a population of about 2000 to 500 individuals. The frequent droughts resulted in declines in the amount of graze available to animals and population crush in some plains game species. There are concern of diseases outbreaks induced by droughts but no recent outbreaks had been recorded in the property. Due to the poor grass production the proponent is looking forward to provision of supplementary feed mainly for white rhinos. However this is not the first time to supplement feed due to poor grazing production in Sango it was done in 2016. There is no permanent water body is Sango hence depend on artificial water supply to sustain animals.

Proposed receiving park areas

The table below shows proposed areas to be restocked with animals from Sango, however some areas can be identified and added to the list basing on the suitability of the areas.

Table 3: Identified proposed sites for restocking

Name	Description
Chizarira National Park	The park covers an area of 1910km ². It lies between (17º 42'S, 27º55'E). The predominant vegetation type is Miombo woodland.

Zambezi National Park	The park covers an area of 560km² and lies between (17º53'S, 25 41'E). Vegetation is divided into five types mixed, Acacia, Zambezi teak (*Baikiaea plurijuga*), *Terminalia* and grasslands.
Mushandike Sanctuary	Covers an area of about 129km² and lies between 20º 12'S, 30º 40' E. The area is dominated by Miombo woodland. A paddock was recently fenced dedicated towards semi-intensive wildlife management.
Sengwa Wildlife Research Area	The park lies between 28°03′ and 28°20′E and 18°01′ and 18°13′S and covering an area of 373 km². The area is dedicated for wildlife research and Miombo woodland is the dominant vegetation.
Matusadonha National Park	The park is located in Northwest Zimbabwe and occupies an area of 1470km². The vegetation found are open *Terminalia-Combretum* woodlands in the valley floor and Miombo woodland in the escarpment and lakeshore grasslands.
Nyanga National Park	The park covers an area of about 47 000 hectares. It is located in the Eastern Highlands of Zimbabwe. Montane forest –grassland and with other areas dominated by Miombo woodland.
Victoria Falls National Park	The predominant vegetation is mopane forest, with small areas of teak and Miombo woodland and a narrow band of riverine forest along the Zambezi.
Matobo National Park	The park covers an area of 424km².The park has mixed type of vegetation that ranges from Mopane, *Acacia* species, *Brachystegia* in other areas, *Azanza* species, *Zizphus* species, *Strychnos* species and *Terminalia* species.

Ecological Suitability of the sites

Suitable habitat is available in all the identified sites for the proposed wildlife translocations and habitat suitability assessments are being carried out. The protected areas already host similar animal species hence the species will certainly adapt to these ecosystems. Most of the areas are

dry savanna woodlands able to support a diverse species of fauna. The proposed areas are dominated by Miombo, Mopane, Acacia and Riverine woodlands which is almost similar to the vegetation types in Sango. Forage availability is enough and these woodlands can support diverse wildlife species and are able to provide feed and cover for these species. Ecological monitoring of mammals both herbivores and carnivores is ongoing with assistance of MoUs signed with various NGOs. Water availability is guaranteed as there are perennial river, water pans, springs, pools that holds water for long periods of time in most of these areas.

Law Enforcement and Safety

Over the past years the Authority has been focusing towards intensifying law enforcement and protection of wildlife hence ensuring the security of wildlife. Current technologies that include the use of drones, SMART and MIKE have been adopted to step-up law enforcement efforts to increase protection of wildlife. Some of the parks have new running vehicles for deployments and permanent bases were reopened to increase the presence and coverage in all parts of the park. Recruitments had been done in almost all park areas to increase the number of people on the ground. Private-Public-Partnership agreement with various organization had been signed resulting in infrastructure development, training of staff and availability of equipment to carryout law enforcement duties effectively. Commitments on conservation education to increase awareness to local communities on protection and wildlife conservation through the use of media, social forums and dialogue all this effected to promote wildlife protection.

Background to decline in some species and how this has been addressed

Most populations were reduced as a result of poaching activities. Rapid response units have been built in most parks in collaboration with donors to step up law enforcements efforts and reduce poaching. Rangers have been trained in Cyber tracking and SMART. Decisions are being based on adaptive management resulting in declines in poaching incidence in most park areas. Community engagement project have been facilitated to ensure that communities experiencing losses from wildlife realize the value of conserving wildlife and benefit from conservation. Trainings had been initiated in local communities on how to mitigate human-wildlife conflicts to increase support for wildlife conservation.

Current situation of animals to be destocked

The animal numbers in Sango had exceeded the ecological carrying capacity of the environment and the animals are overstocked. This has led to vegetation damage and decline in the grazing potential of the area to support grazers. The uprooting of trees is massive and certain tree species will disappear in the near future and some species may fail to regenerate from the impacts.

Table 4: Animals to be destocked from Sango

Species name	Number to be destocked
Elephants	400
Giraffes	70
Eland	50
Zebra	50
Wildebeest	50
Buffalo	50
Impala	2000
Wild dogs	1 pack
Lions	2 prides

Recommendations

- The proposed wildlife destocking exercise from Sango to appropriate Parks Estate is recommended.
- Elephants to be translocated to identified Parks area so as to reduce numbers in the Sango SVC and relieve pressure on vegetation and enhance recovery.
- Due to the decline in grazing potential of the area plains game can be destocked in the area to prevent population crash due to poor and unavailability of forage.
- The animal population in Save Valley Conservancy are a shared populations. Hence a holistic approach toward mitigating the ecological damage requires that the whole conservancy be involved to mitigate against possible conflicts among other property owners in Sango.

SAVE VALLEY CONSERVANCY
P O Box M13
MABELREIGN
HARARE

15th October 2019

THE DIRECTOR GENERAL
ZIMPARKS
HARARE

Dear Fulton

REF: PROPOSED TRANSLOCATION OF 600 ELEPHANT FROM SVC TO SAPI, CHIZARIRA AND MAVURADHONA

As per Mrs Mandisodza's recommendation after Zimparks ecological survey (attached) in the north of SVC, the SVC hereby writes to confirm that the Committee has ratified the following for translocation to Zimparks approved destinations:

600 elephants
2 000 impala
50 buffalo
40 giraffe
1 pack wild dog
2 prides lion

Mrs Price will begin the process of applying for translocation permits. Once our aerial survey is complete SVC will review Sango's list regarding the additional off take of zebra, eland and wildebeest.

Attached is the brochure for the proposed elephant translocation. The donor has confirmed they are happy to fund the entire translocation.

Yours faithfully

STEVEN J E F VOS
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Cell: +263 782 708021

WELDON SCHENCK
CHAIRPERSON SVC
Email: ws@sortitout.me
Cell: +263 714 532475

CC: CHIEF ECOLOGIST TERRESTRIAL, MRS R MANDISODZA

FOR IMMEDIATE RELEASE

Save Valley Conservancy, Translocation of Wildlife.

Following a statement by Zimbabwe Parks and Wildlife Management Authority (Zimparks) the Save Valley Conservancy issues the following statement.

The conservation success story of the Save Valley Conservancy (SVC) in the south east of Zimbabwe is truly a beacon of light for the long term. The SVC has been called "The Gold Standard of Conservation" by American NGO's for good reason. Sustainable livelihood of the Big Five as well as numerous plains game and other predator species living in the pristine, unspoiled protected area, that is the Save Valley Conservancy. The Save Valley Conservancy, once a series of cattle ranches, has over the last three decades proved that the business model of conservation based on sustainable use can work, so much so that the conservancy today has an overabundance of species and is able to be seen a source population for the re-populating or augmentation of several species in Zimparks estates.

To this end the Zimbabwe Parks and Wildlife Management Authority has recently issued permits for the translocation of up to 600 elephant to various destinations within Zimbabwe. A selection of plains game and other species has also been earmarked for translocation to release pressure on grazing and browsing in the Save Valley. The Conservancy would like to commend the Zimbabwe Department of National Parks in their progressive outlook with regards to the sustainable management of their wildlife resources.

The translocation is proposed to take place in 2020/21 following the engagement of relevant stakeholders, ecologists and supporters to ensure that the destination landscapes are ecologically capable of sustaining the new wildlife and that the adequate protective and management measures are in place.
The SVC is working closely in the initial planning stages of the project with the donors, ecologists, capture specialists and stakeholders to ensure the sustainability and success of the proposed translocation.

The Save Valley Conservancy has engaged with The Ivan Carter Wildlife Conservation Alliance to assist with several aspects of this translocation and we are very grateful to the Cabela Family Foundation for underwriting 100% of this this translocation as a commitment to the conservation of key species and ecosystems in Africa. The Conservancy is proud to be associated with ZimParks in this proposed project which is of vital importance to conservation in Zimbabwe.

The SVC is looking forward to a successful partnership with Zimparks in ensuring the safe completion of the translocation. There are some areas in Zimbabwe that over the years have suffered wildlife losses due to illegal poaching and human wildlife conflict. With renewed commitment from Zimparks and its associated partners, stronger anti-poaching measures are now in place in these areas alongside safe boundary management and the SVC is assured that the animals will be able to flourish in their new homes.

To this end the SVC is proud to be able to prove that sustainable use of wildlife does indeed create excess animals, which can in turn be used to repopulated National Parks and related wildlife areas.

To date the Save Valley remains a prime destination. Good rains in the Lowveld region have ensured Save Valley has flowing rivers and adequate forage and feed for the abundant wildlife. The translocation proposal is there as a management tool to ensure that the Save Valley remains one of the last large-scale pristine wildlife areas on the planet. And it will assist other areas in Zimbabwe that are capable of sustaining wildlife long term where their populations have been diminished.

Any press enquiries should be directed to the SVC COO Steven Vos at coo@savevalleyconservancy.org

Carnivore Densities in the Savé Valley Conservancy

Results of the 2018 Spoor Survey & Wild Dog Monitoring Project

Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund
(Spoor survey carried out by Amy Wolton, Rueben Boté, and Douglas Tomwe)

Introduction

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

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

This report presents the results of the October 2018 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.

Methodology

The 2018 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of

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

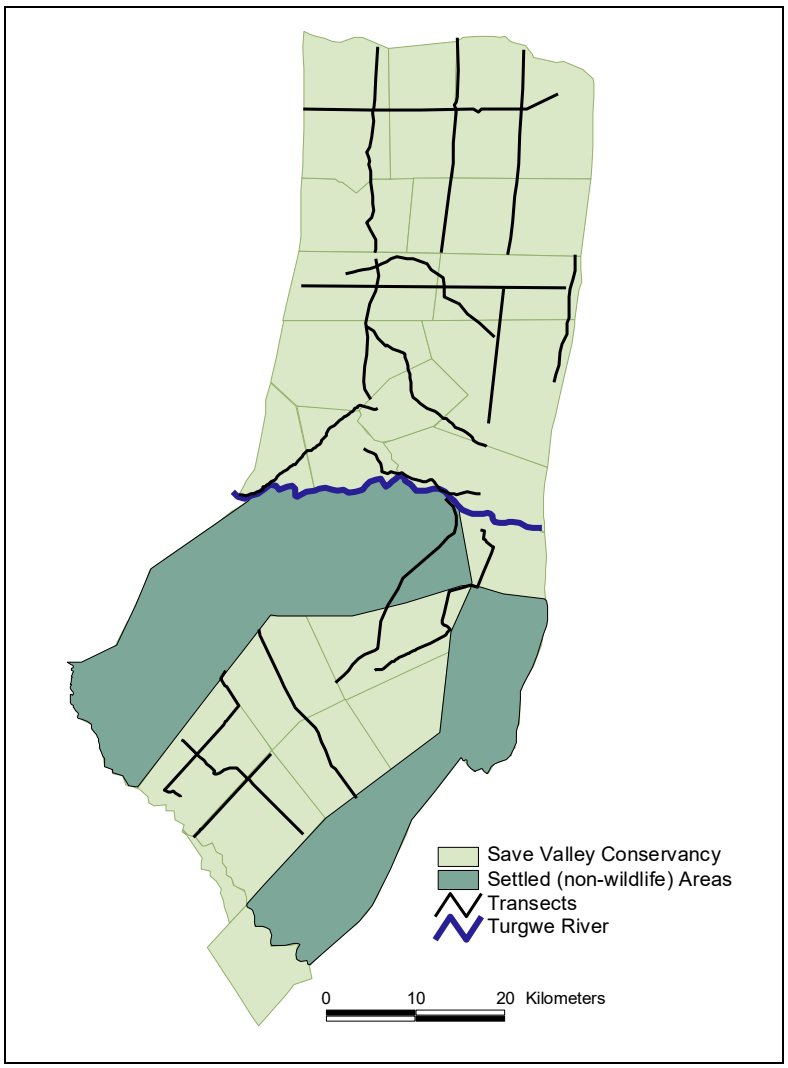
The total area of the Savé Valley Conservancy is 3,490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2,439km^2; 1,639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.5 km, giving a penetration ratio of 6.32. In southern SVC, the combined transect length was 130.9 km, giving a penetration ratio of 6.12. For the conservancy as a whole, 390.4 km were driven (penetration ratio 6.25).

Transects surveyed were the same as those used in 2007-2017 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Boté, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.6 km and 29.1 km in length, with a mean transect length of 21.7 km.

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

Figure 1. Map of the transects driven – October 2018



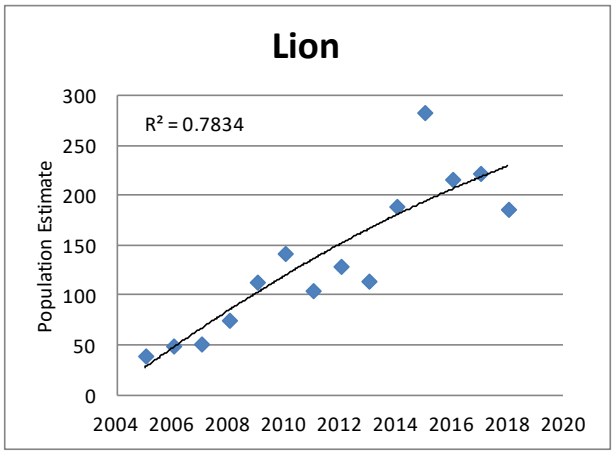
Results

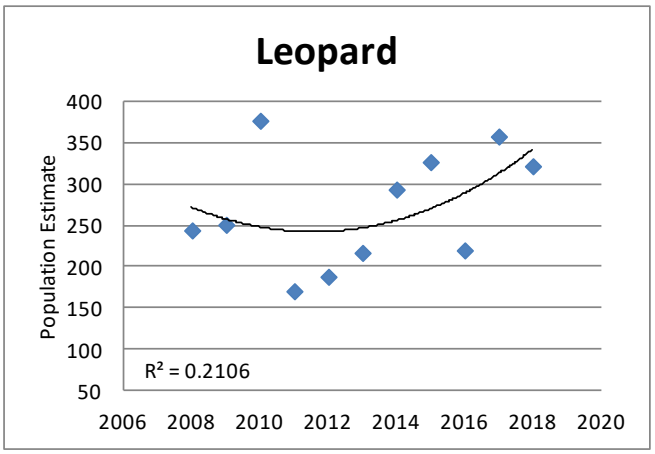
Table 1: Summary of survey parameters (2018)

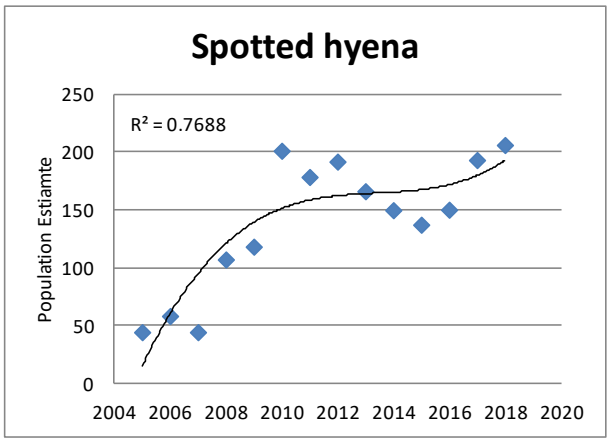
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	259.5	130.9	390.4
Penetration ratio	6.32	6.12	6.25

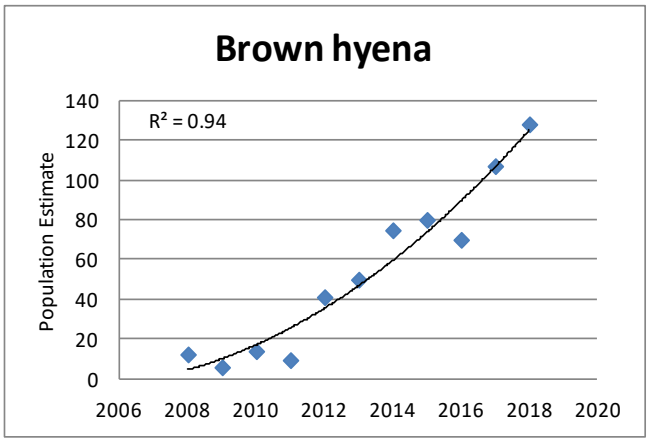
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2018 (from 2005-2018 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs only)**.**

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223	187
Leopard				245	252	378	172	189	218	295	328	221	359	323
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193	206
Brown hyena				12	6	14	10	41	50	75	80	70	107	128
African Wild dog				45	60	64	61	86	90	81	91	99	94	96
Black backed jackal				188	190	157	141	151	199	229	241	234	296	153









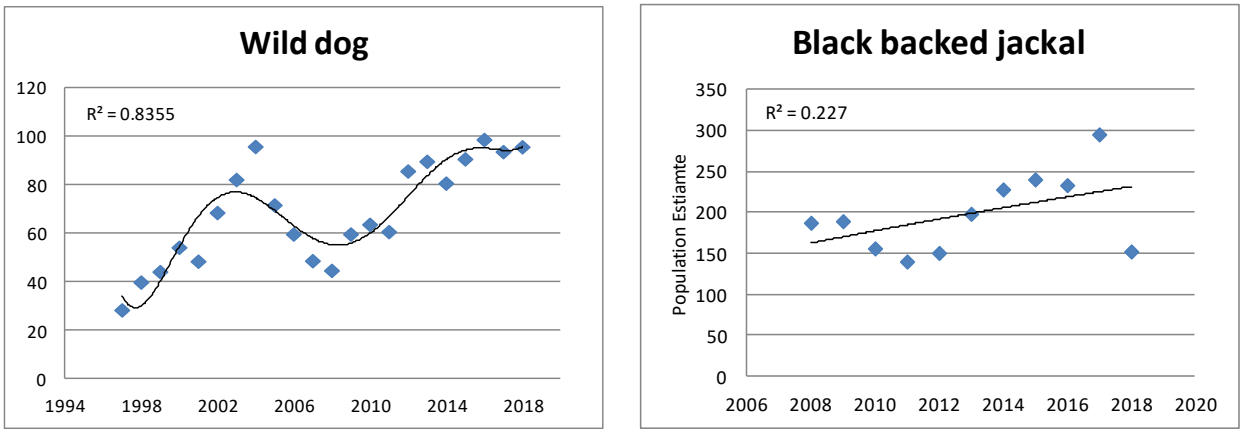


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken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

Discussion

The results show a slight drop in lion and leopard numbers, and a significant decline in black backed jackals (currently unclear as to whether this represents a genuine decline or simply a low count). The spotted and brown hyenas, and wild dog population, remain stable and/or increasing.

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to have been relatively stable since 2014, with a few natural fluctuations. Despite the slight decrease in estimated individuals since last year, the population **estimate of 187 lions** in 2018 is within range of the long-term population trend (Figure 2).

The number of lions in SVC equates to a **density of 7.7 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 98 lion tracks we encountered, 22% were adult males, with 65% identified as adult females, 6% as young cubs, and 7% of tracts were unidentified. With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

In 2018 there were an estimated **323 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2011 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a positive trend (Figure 2).

Leopards are at a **density of 13.3 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in other places, for example in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (8.1 / 100km^2; Groom & Watermeyer 2018). Finally, the SVC leopard population appears to display a 2:1 ratio skewed in the favour

of females. Of the 74 leopard tracks we recorded, 62% were adult females and 30% were adult males. No cub tracts were recorded (0%) and 8% of the tracts were unidentified.

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

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. Indeed, there were an estimated **206 spotted hyenas** in 2018. The hyena population could be doing better in light of the recently stabilising lion numbers, but we will need to monitor the population to determine if a true trend is emerging.

Spotted hyenas are at a density of **8.4 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 10.4 / 100km^2 in Gonarezhou National Park (Groom & Watermeyer 2018). Given the relatively lower density of the species in the conservancy, they may still increase more (especially if the lion numbers continue to drop).

There were an estimated **128 brown hyenas** in the conservancy in 2018. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **5.2 brown hyenas / 100km^2** in 2018 which is higher than the average (3.4 brown hyenas / 100km^2) over the last few years (2014-2017).

As reported consistently for the past few years, the **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 96 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km^2)**. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 278 wild dogs in the conservancy, with a density of 11.4 African wild dogs / 100km^2. This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

When counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time. Nonetheless, their population has been relatively stable since 2011.

There has been a significant decrease in the **black backed jackal** population estimate for the conservancy. At an estimated **153 black backed jackals** in 2018, this is the lowest count of the species since 2013. Whether this is a true decline or not is unclear. At this stage, however, we are cautiously treating the 2018 count as an anomaly, but this species will need to be watched very closely. The estimated density of jackals was **6.3 jackals / 100km^2** in 2018.

We once again stress, that the spoor encounter rate for **cheetah** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetah, even with large confidence intervals. Indeed, **we did not pick up a signal track for cheetah in the 2018 spoor survey**. Although we know that there are resident cheetah in the conservancy, we can safely say the population is still very low (zero cheetah tracks were seen in the 390.4 km of transects driven in 2018). However, spoor surveys are not appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. **The Cheetah Conservation Project Zimbabwe, which collected updated photographic information on cheetah throughout Zimbabwe, estimated c. 12 adult cheetahs in SVC in 2015 (van der Meer, 2016).** We have no reason to think this number has changed much.

Word of caution

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

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

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Appendix 1: All Spoor Survey Results for All Species Counted (2018)

NORTH SVC Species	Survey North SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed	1639	83.9186948	Leopard	5.120115607	259.5	19	13.65789474	259.5	6.315992293	7.32177264
Brown hyaena	1639	96.2873025	Lion (Y=0.3049X)	5.874759152	259.5	50	5.19	259.5	6.315992293	19.26782274
Cheetah	1639	0	Lion (Y=0.3049X)	0	259.5	0	0	259.5	6.315992293	0
Civet	1639	777.3521202	Leopard	47.42843931	259.5	176	1.474431818	259.5	6.315992293	67.82273603
Honey badger	1639	70.66837457	Leopard	4.311676301	259.5	16	16.21875	259.5	6.315992293	6.165703276
Leopard	1639	260.5896312	Leopard	15.89930636	259.5	59	4.398305085	259.5	6.315992293	22.73603083
Lion	1639	138.6537156	Lion (Y=0.3049X)	8.459653179	259.5	72	3.604166667	259.5	6.315992293	27.74566474
Spotted hyaena	1639	125.1734933	Lion (Y=0.3049X)	7.637186898	259.5	65	3.992307692	259.5	6.315992293	25.04816956
Wild dog	1639	215.6835576	Lion (Y=0.3049X)	13.1594605	259.5	112	2.316964286	259.5	6.315992293	43.15992293
African wildcat	1639	30.91741387	Leopard	1.886358382	259.5	7	37.07142857	259.5	6.315992293	2.697495183

SOUTH SVC Species	Survey South SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed	800.57	68.42946995	Leopard	8.547593583	130.9	16	8.18125	130.9	6.115889992	12.22307105
Brown hyaena	800.57	31.7004926	Lion (Y=0.3049X)	3.95974026	130.9	17	7.7	130.9	6.115889992	12.98701299
Cheetah	800.57	0	Lion (Y=0.3049X)	0	130.9	0	0	130.9	6.115889992	0
Civet	800.57	222.3957773	Leopard	27.77967914	130.9	52	2.517307692	130.9	6.115889992	39.7249809
Honey badger	800.57	17.10736749	Leopard	2.136898396	130.9	4	32.725	130.9	6.115889992	3.055767762
Leopard	800.57	64.15262807	Leopard	8.013368984	130.9	15	8.726666667	130.9	6.115889992	11.45912911
Lion	800.57	48.48310633	Lion (Y=0.3049X)	6.056073338	130.9	26	5.034615385	130.9	6.115889992	19.86249045
Spotted hyaena	800.57	80.18359892	Lion (Y=0.3049X)	10.0158136	130.9	43	3.044186047	130.9	6.115889992	32.84950344
Wild dog	800.57	63.40098519	Lion (Y=0.3049X)	7.919480519	130.9	34	3.85	130.9	6.115889992	25.97402597
African wildcat	800.57	8.553683743	Leopard	1.068449198	130.9	2	65.45	130.9	6.115889992	1.527883881

TOTAL SVC	Survey	Est.	Equation Used	Est. density	Distance	No. of	Spoor	Transect	Penetration	Spoor density
	Total SVC	(Total area)	Stander1998	(Animals/100km2)	(km)	counted	(km/spoor)	(km)	(Area/length)	(Spoor/100km)
Species	(Km2)			Y=0.3049X Y=0.6993X	Sum of			Sum of routes		
Black-backed	2439	152.9091816	Leopard	6.269339139	390.4	35	11.15428571	390.4	6.247438525	8.965163934
Brown hyaena	2439	127.6245484	Lion (Y=0.3049X)	5.232658811	390.4	67	5.826865672	390.4	6.247438525	17.16188525
Cheetah	2439	0	Lion (Y=0.3049X)	0	390.4	0	0	390.4	6.247438525	0
Civet	2439	996.0940973	Leopard	40.84026639	390.4	228	1.712280702	390.4	6.247438525	58.40163934
Honey badger	2439	87.3766752	Leopard	3.582479508	390.4	20	19.52	390.4	6.247438525	5.12295082
Leopard	2439	323.2936983	Leopard	13.25517418	390.4	74	5.275675676	390.4	6.247438525	18.95491803
Lion	2439	186.6747126	Lion (Y=0.3049X)	7.653739754	390.4	98	3.983673469	390.4	6.247438525	25.10245902
Spotted hyaena	2439	205.7231527	Lion (Y=0.3049X)	8.434733607	390.4	108	3.614814815	390.4	6.247438525	27.66393443
Wild dog	2439	278.1072249	Lion (Y=0.3049X)	11.40251025	390.4	146	2.673972603	390.4	6.247438525	37.39754098
African wildcat	2439	39.31950384	Leopard	1.612115779	390.4	9	43.37777778	390.4	6.247438525	2.305327869

600 ELEPHANTS

The largest elephant translocation in history.

IVAN CARTER
WILDLIFE CONSERVATION ALLIANCE

Savé Valley
CONSERVANCY

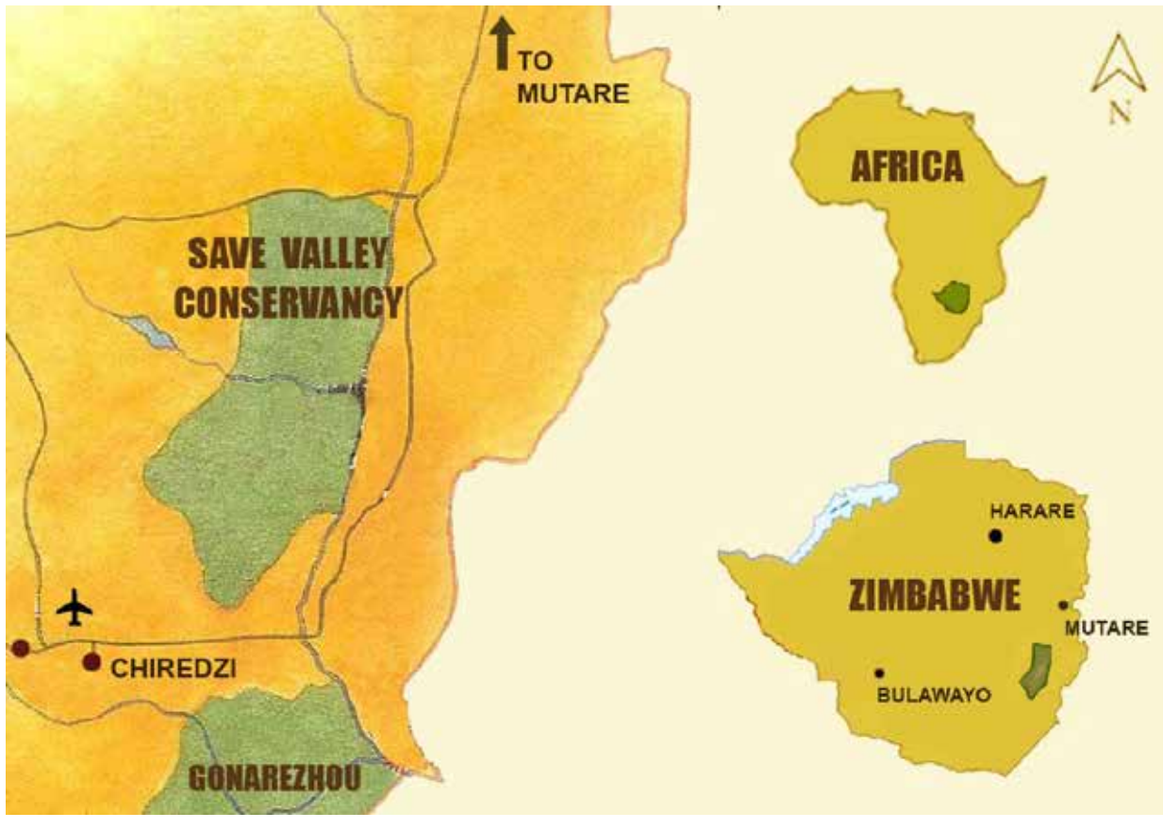
HISTORY OF SAVE VALLEY CONSERVANCY

The Savé Valley conservancy covers an area of some 3400 km2.

The area was once populated by a substantial elephant population, but the majority were eliminated in the 1950's during a campaign against Foot-and-Mouth disease in order to make land available for cattle farming.

In the early 1990's the land was once again repurposed for the use of wildlife. Together, the members of the newly formed Conservancy collaborated to create what has become the SVC today. A massive external fence was built around the whole area, water points established, a road infrastructure developed, safari camp facilities built and anti-poaching activities were taken up to secure the area.

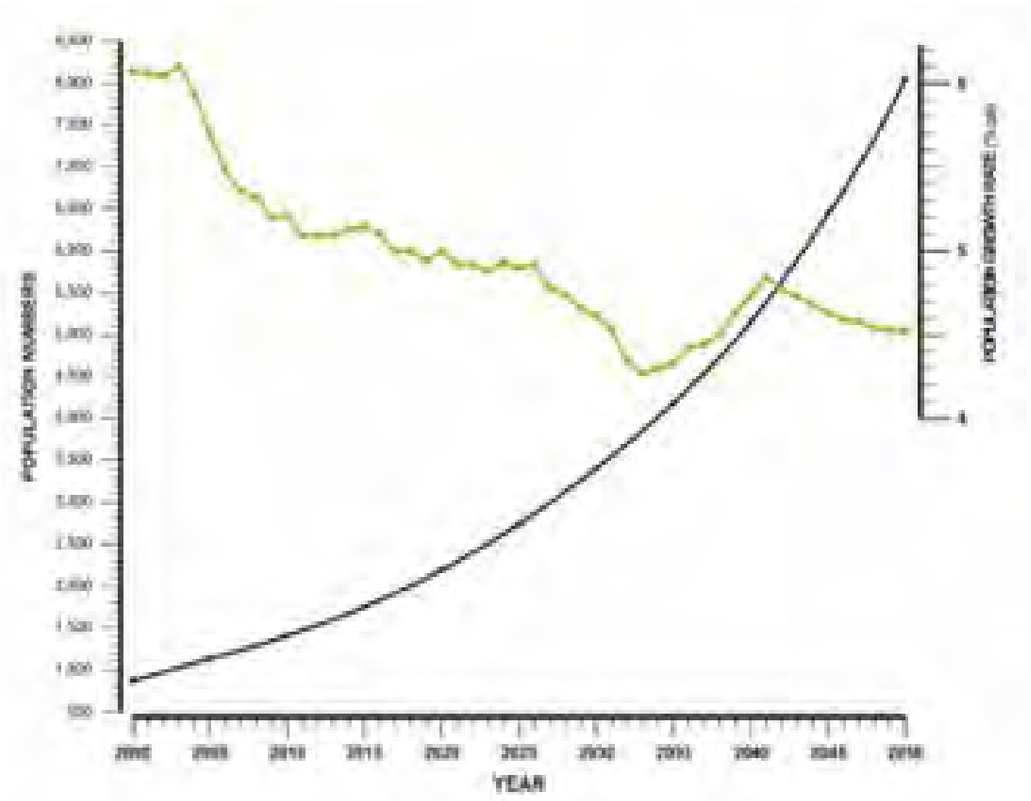
Animal species, additional to those already existing in the area, were introduced. Wildlife populations increased rapidly and withn a few years, SVC was home to globally significant populations of endangered African wild dogs and black rhinos and substantial populations of other threatened species such as elephants; cheetah; white rhino; southern ground hornbills and lappet faced vultures.



SVC ELEPHANT POPULATION

The elephant population in Gonarezhou National Park was relatively high in 1991 (over 5,000 animals) and a severe drought precipitated a population crash. Over a thousand elephants died in the park and 526 were translocated to the Savé Conservancy. The relocated elephants established themselves in the Conservancy and began to increase in numbers after 1992 to the point where their present density is once more a matter for concern due to the significant conservation success story behind the Conservancy.

The SVC has a well organised, professional full-time anti-poaching unit. The risk became too high for poachers to pursue ivory and elephant poaching has been virtually eradicated. This has allowed elephant populations to thrive on the Conservancy.



The Challenge

This incredible success story creates challenges of its own. Elephants have a significant impact on their habitat as a keystone species and if their populations are left unchecked, they threaten the very ecosystem they depend on for their survival. Conservation best practise dictates that the elephant numbers must be reduced drastically.

THE INITIATIVE

In order to mitigate the impacts of excessive elephant populations, there is an urgent need to translocate elephants. This will facilitate saving the flora from further damage, reduce the impact of human / wildlife conflict, and reduce PAC (problem animal control) incidents as well as, repopulate safe locations where in the past elephants have existed.

The alternative of culling elephants is the last resort option, which must be avoided at all costs.

The Goal

Translocate up to 600 elephants to aleviate the pressure on the Save Valley ecosystem. While repopulating depleted areas within Zimbabwe that have adequate protection to ensure their succesful re-introduction.

The Relevance

Never before has the hunting community been able to showcase such concrete conservation returns for large animals where hunter's dollars have led to the protection of the entire ecosystem.

THE DESTINATIONS

The destinations proposed for the SVC elephants are all areas where anti-poaching has been re-established, the private sector has re-engaged and there are community engagement projects under way. Each of these areas have private and NGO funding to continue the project and habitat suitability assessments are being carried out:

① CHIZARIRA NATIONAL PARK
200 elephants

- An area measuring 2000 km2 on the Zambezi Escarpment.
- As part of the Zimparks privatisation plan, Chizarira now falls under private management by way of an MoU with Bejani Trust.

② SAPI SAFARI AREA
200 elephants

- Sapi forms part of three separate State protected areas and is declared a UNESCO World Heritage Site.
- The area measures in at 1200 km2. Anti-poaching efforts are managed privately by Great Plains Conservation.

③ MAVURADHONA WILDERNESS AREA
200 elephants

- Designated as a protected wilderness area in 1982 and afforded National Monument Status in 2017.
- The area spans 615 km2 and has been fenced to elephant proof standards.
- Anti-poaching is managed by a local NGO as part of an upscaled anti-poaching effort up to the border of Mozambique.

THE CAPTURE ITSELF

Moving 600 elephants is no small task and a skilled team of professionals will be required in order to make this dream a reality.

Elephant family herds are carefully selected for suitability. Once chosen, the entire herd is quickly darted by helicopter and put to sleep by a professional game capture team. Each individual elephant is attended to, ensuring the safety of both the elephants and the people, taking genetic data, collaring and taking measurements.

The elephants are then gently hoisted by crane onto flatbed trucks where they are driven to a collection point and transferred to a holding truck. The drugs reversed and they are woken up, fed, cooled, and are moved overnight by road to their destination where they are released into their new environment with as minimal stress to the animals as possible.

The Follow Up

- The matriarch of each group will be collared - researchers will monitor and interpret the data over a three year period.
- At the end of three years, the project will be deemed a success and the collars will be removed.
- The scientific team that will monitor this will be overseen by the same two individuals that oversee 24 lions in Mozambique.

CABELA FAMILY FOUNDATION

Key Points of Agreement

- This will be the most elephants ever translocated anywhere to date.
- There will be a clear contract about branding and how the Cabela Family Foundation logo and name will appear on all media generated.
- The government permits giving legal permission will be in hand.
- There is a signed letter from the SVC Chairman, COO and all Conservancy stakeholders upon whose land the elephant will be captured.
- The family will partake from the 13-19th July, with no other observers present that are unrelated to the physical translocation.
- Any partnership or involvement of any third party NGO's will first be discussed and unanimously agreed upon by the Cabela Family Foundation.
- No funds will be expected to change hands until all permits, permissions and key points of agreement are met.

Commitments

- We will have exclusive filming and media rights for the entire process.
- The initiative will be professionally filmed for both social media and online platform distribution.
- Writers and media from both the hunting and non-huntings sectors will be engaged to help spread the word and get international traction around the story.
- Time will be set aside for participants to get their hands on elephants and be actively involved in the tasks required for the translocation.

“There may be a day I cannot make a difference but there will never be a day that I do not try.” - Ivan Carter

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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

June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

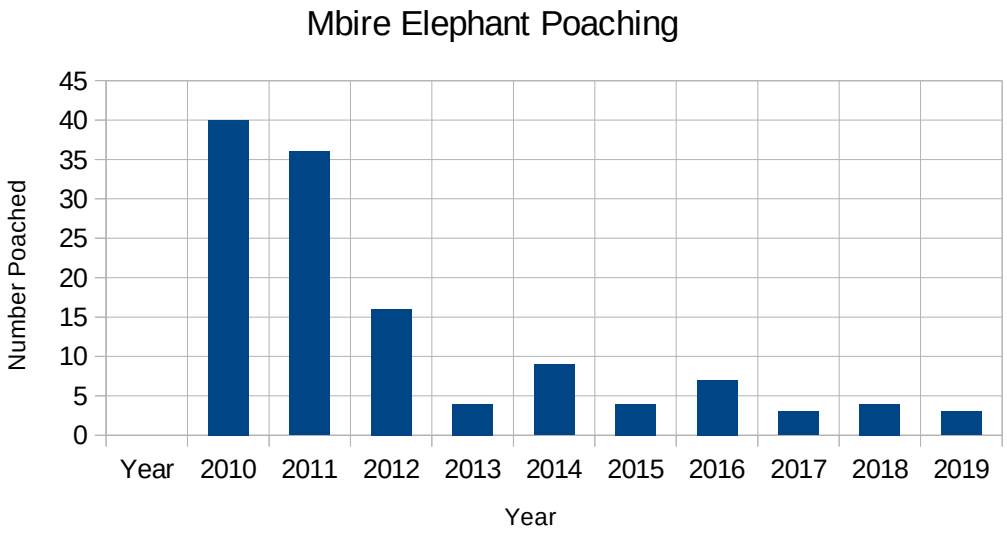

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

From: King, Jenna D
To: cf@conservationforce.org
Cc: Brisendine, Amy
Subject: FWS Permit Application #78387C
Date: Monday, August 17, 2020 9:10:43 AM

Hello,

This email is in regard to the FWS permit application #78387C for Paul Cater to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between June 19, 2018 and July 12, 2018. Please provide the specific date that the lion was taken. Also, please specify which ranch within the Save Valley Conservancy the lion was taken from.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: Aimee Korver
To: John J. Jackson, III; King, Jenna D; (b) (6) ; leon@savesafaris.com; John Jackson, III
Subject: [EXTERNAL] Re: Fwd: FWS Permit Application #78387C
Date: Tuesday, August 18, 2020 12:32:53 PM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. King,

Attached you will find the TRAS2 hunting permits for Mr. Cater's hunt. The date the lion was taken was June 28th, 2018.

The Ranch that the hunt took place in was Mapari Ranch in Save Valley Conservancy Masvingo Province.

Please let us know that you have received this information and if you have any other questions.

Thank you,
AiméeKorver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

> -------- Forwarded Message --------
> Subject: FWS Permit Application #78387C
> Date: Mon, 17 Aug 2020 13:10:42 +0000
> From: King, Jenna D <jenna_king@fws.gov>
> To: cf@conservationforce.org <cf@conservationforce.org>
> CC: Brisendine, Amy <amy_brisendine@fws.gov>
>
>
>
> Hello,
>
> This email is in regard to the FWS permit application #78387C for Paul
> Cater to import a lion trophy from Zimbabwe. On the application, it was
> indicated that the hunt was to take place between June 19, 2018 and July
> 12, 2018. Please provide the specific date that the lion was taken.
> Also, please specify which ranch within the Save Valley Conservancy the
> lion was taken from.
>
> Please reply directly to this email with the requested information.
>

> Thank you and let me know if you have any questions.
>
> /In accordance with 50 CFR 13.ll(e), if the requested information is not
> received by this office*within 45 calendar days of the date of this
> email*, your application will be abandoned and administratively closed.
> Once a file is closed, you will need to submit a new application, and
> all required fees, for the Service to consider your proposed activity. /
>
>
> Thank you,
>
> Jenna King
> U.S. Fish and Wildlife Service
> International Affairs, Division of Management Authority
> Branch of Permits
> 5275 Leesburg Pike,MS: IA; 2W059D
> Falls Church, Virginia 22041
> https://www.fws.gov/international/permits/
> https://www.cites.or <https://www.cites.org/eng/disc/how.php>g
>

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

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

0000080590
AUTHORIZED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Save Safaris	**Client's Full Name**	Paul Cater
ZTA (HOP) No.	HOP0220	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	P O Box CH 381, Chisipite, HARARE	**Address**	(b) (6) Katy Texas USA
Name of Professional Hunter	LEON DU PLESSIS	**Licence No.**	102
Telephone		**Fax**	0
Number of Accompanying Guests		2	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	CHIPITANI SAFARI COMPANY P/L	**Address**	8 RIVONIA ROAD MOUNT PLEASANT HARARE
Name of Shipping Agent	LD FORWARDING CO. LTD	**Address**	P O BOX GD467 GREENDALE HARARE TEL 492650
Name of Foreign Agent	Hunters Choice Safaris	**Address**	(b) (6) Texas

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Matendere	Masvingo	
2	Mapari	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	22-06-2018
Date of Safari To	10-07-2018
Daily Rate Charged For Big Game USD	1,500.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	230.00
Number of Accompanying Guests	2

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate

Less Commission

Other fees (Incidentals)

Percentage Commission Charged

Total Guests rate

Total Trophy fees

Grand Total USD

Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	KUDU	M	K	Matendere		26/6		
2	LION	M	K	Mapari	36K423100/17785252	28/6	23 3/8	
3	LEOPARD	M	K	Matendere	36K406770/17779597	30/6	15 2/8	
4	GIRAFFE	M	K	"	36K406183/17776958	24/6	NA	
5	GIRAFFE	M	K	"	36K406241/17776639	25/6	NA	
6	IMPALA	M	K	Mapari	36K429502/17788672		Bait	
7	"	M	K	"	36K429505/17788681		Bait	
8	"	M	K	"	36K420282/17781251		Bait	
9								
10								
11								
12								
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I Paul Cutler (b) (6) hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client _____ Date 11/7/2018

Signature of Professional Hunter _____ Date 10-7-18

Signature of Safari Operator _____ Date 10/7/18

From: **Mel Payne** [redacted]@savesafaris.com
Subject: lion permit
Date: 26 June 2018 at 4:22 PM
To: Leon du Plessis leon@savesafaris.com

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 26 June 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Save Safaris who have applied for permit to hunt 1 x lion with client Paul Cater in the following properties:

- Matendere Ranch in Save Valley Conservancy Masvingo Province
- Mapari Ranch in Save Valley Conservancy Masvingo Province

The hunt will be **from 26 June 2018 to 04 July 2018** under the guidance of professional hunter **L. du Plessis** PH license **#102**.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~..... .....
Investigation and Security Manager **Date**

Approved/ Not Approved..... .....
Head Management Services **Date**

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.18 13:07:57 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 78387C

JENNA KING Digitally signed by JENNA KING Date: 2020.08.18 12:50:51 -04'00'

Enhancement Finding

Applicant: Paul David Cater (PRT–78387C)

Introduction

Paul David Cater submitted an application on February 26, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken in June 28, 2018, from the Savé Valley Conservancy (SVC), Mapari Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Paul David Cater hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Cater's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Cater himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Cater supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Cater, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Cater in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Cater's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Cater's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Cater's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Cater, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Cater's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Cater submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Cater plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Cater's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Cater's permit request, we find that the expertise, facilities, or other resources available to Mr. Cater appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Cater's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Cater's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Cater on June 28, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Paul David Cater of Katy, Texas.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 18, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.18 12:53:09 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 78387C, Paul David Cater, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requested U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.18 13:06:24 -04'00'

Signature:_____ Date: _____

[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____

List species or critical habitat unit

C. Conference required _____

List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA78387C-0
Effective: 08/18/2020 Expires: 08/17/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.19 08:58:30 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
PAUL DAVID CATER
(b) (6)
KATY, TX 77493
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD JUL 31 2018

LB

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

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

Type of Activity

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

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

Section A: Complete if applying as an individual

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

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

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

Section C: All applicants complete address information

1 a Physical address (Street address, Apartment #, Suite #, or Room #; no P O Boxes)
(b) (6)

1 b City	1 c State	1 d Zip code/Postal code	1 e County/Province	1 f Country
Shreveport	Louisiana	71101	Caddo	USA

2 a Mailing address (include if different than physical address; include name of contact person if applicable)
Same as above Darbi Rice (b) (6)

2 b City	2 c State	2 d Zip code/Postal code	2 e

Section D: All applicants MUST complete

1 Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U S FISH AND WILDLIFE SERVICE in the amount of **$100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13 11(d)]

2 Certification I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accu[illegible]ief I understand that any false statement herein may subject me to the criminal penalties of 18 U S C 1001

(b) (6)

Signature of ap[illegible] (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 07/18/2018

Please continue to next page

OMB Control No 1018-0093
Expires 08/31/2020

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

Fedex envelope enclosed

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

Darbi Rice (b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

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

   Panthera leo, Lion

   b. Sex (if known). Male

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

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

   b. Date wildlife is to be hunted:

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

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

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

   Area - South Eastern Lowveld, Zimbabwe; Region - Masvingo Province. GIS coordinates - 962143; Ranch - Senuko Ranch; Conservancy - Sa Valley; Hunting block - Senuko 2; Nearest city - Chiredzi town

   b. Date wildlife was hunted:

   1-6-18

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

Clive Hallamore
Hallamore Hunt

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

Trophy Consultants International

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

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

Name: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Rd
City: Belmont
State/Province: Bulawayo
Country, Postal Code: Zimbabwe

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

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

Please see attached SVC carnivore survey

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

1500/day x 21 days + 16,000 trophy fee. All fees are back into the hunting area in the form of running costs such as staff wages, water, power, fuel, anti-poaching, rd Mainten etc.

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

Other hunts are also done in t area which fund the above which benefits all specie including lion. The Senuko Ranch also partners with th local community which helps with poaching pressure etc

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

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

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

    Taxidermist/Broker's signature: _____ Date: _____

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

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

    Applicant's signature: _____ (b) (6) _____ Date: 7-18-18

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

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

Any additional questions please call Kevin Short
With Hallamore Hunt
(b) (6)
or
Email Glenn (b) (6)
He is the Senuko Ranch Operator.

Thank you.

001706

050

NPWLTTES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PHL: .....
PHL 26
Amount paid $400
Date 14-12-17
Rec H10R072020

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*].

to .....

of .....

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section Senuko 2 of the Masvingo Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-18 and 31-12-18 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
Antbear	2		Duiker (m)	3		Hare	1	
Baboon	10		Eland (m)	3		Honey badger	2	
Buffalo (f)	2		Elephant (m)	1		Hornbill	1	
Buffalo (m)	10		Elephant (T/L	1		S. Hyaena	2	
Bushbuck (m)	1		Francolin	2		Impala (m)	20	
Bushpig	3		Geese	1		Klipspringer (m)	2	
Caracal	1		Genet	4		Kudu (m)	5	
Civet	3		Giraffe (m)	3		Lion (m)	1	
Cobra	1		Grysbok (Sharpe's) (m)	2		Leopard (m)	1	
Dassie	2		Guinea fowl	2		Mongoose	2	

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Parks and Wildlife Management Authority which issue the permit

MANAGEMENT SERVICES CONSUMPTIVE
02 JAN 2018
HEAD OFFICE
P.O BOX CY 140 CAUSEWAY HARARE
TEL: (04) 707 624-9 / 792783-7

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(*Designation* AREA MANAGER)

.....
for Finance Manager

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(*Designation* ADCS)

Printed by Printflow (Private) Limited.

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

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

0000080404
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Senuko Ranching (Pvt) Limited	Client's Full Name	Brandon Trey Morris
ZTA (HOP) No.	HOP0302	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	Glenn Stockil P Bag 7138 Chiredzi glenns@senuko.com	Address	(b) (6)
Name of Professional Hunter	Clive Hallamore	Licence No.	418
Telephone		Fax	0
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	TCI EXPORTERS	Address	BULAWAYO
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Senuko 3	Masvingo	
2	Senuko 2	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	25-05-2018
Date of Safari To	14-06-2018
Daily Rate Charged For Big Game USD	1,500.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

PARKS & WILDLIFE MANAGEMENT AUTHORITY
SOUTHERN REGION
ZPWMA
25 MAY 2018 Date Stamp
SAVE VALLEY CONSERVANCY
P.O. BOX 121 BIRCHENOUGH
TEL: 039263115/4

African Wildlife Conservation Fund

Savé Valley CONSERVANCY

Carnivore Densities in the Savé Valley Conservancy

Results of the 2017 Spoor Survey & Wild Dog Monitoring Project

Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

Introduction

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

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

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

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

Methodology

The 2017 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of

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

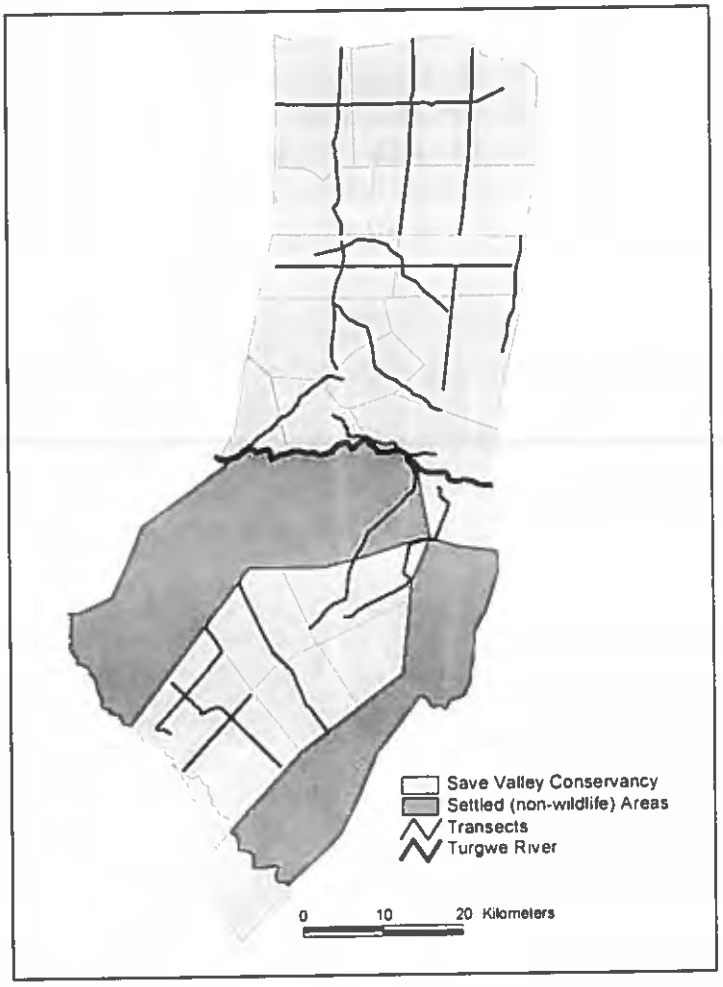
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

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

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

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

Figure 1. Map of the transects driven – October 2017



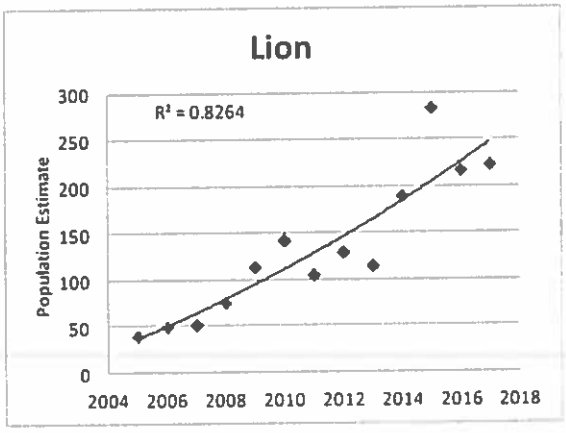
Results

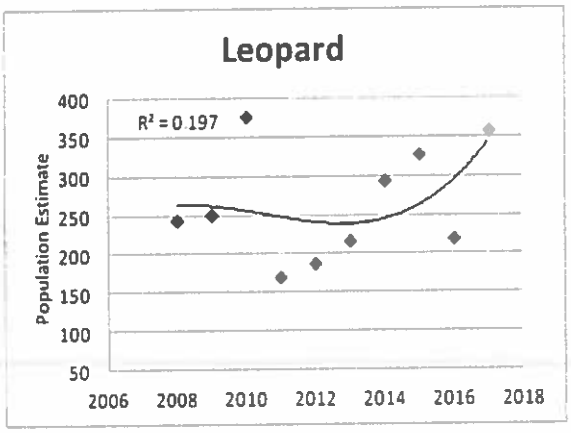
Table 1: Summary of survey parameters (2017)

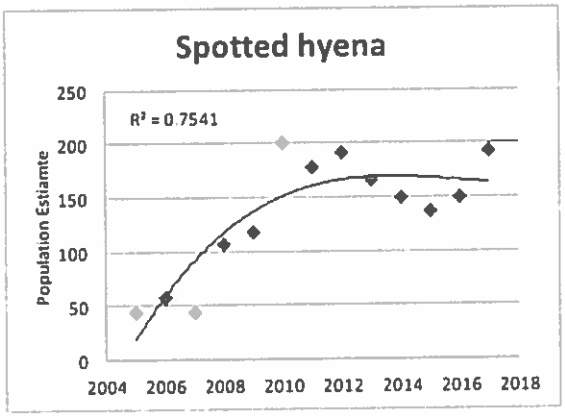
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km²)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

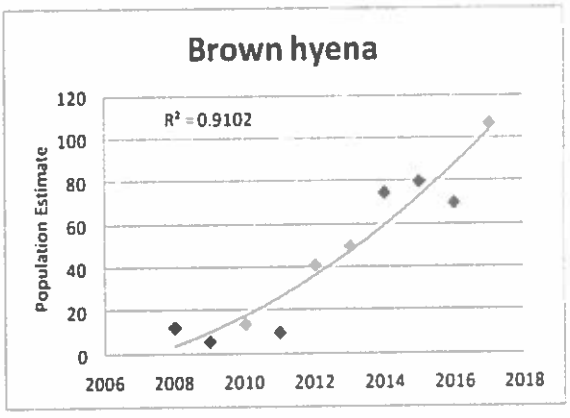
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs).

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









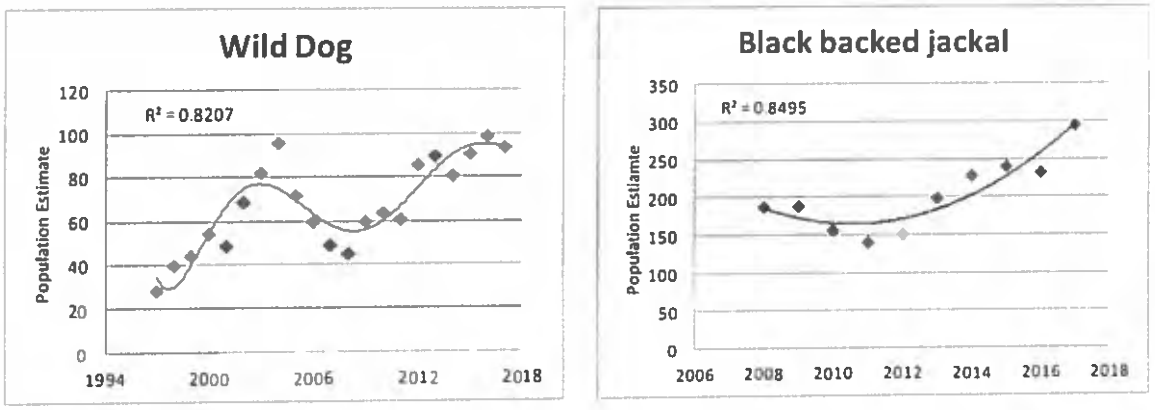


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken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

Discussion

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

Interpretation of results for each species

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Word of caution

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

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

Acknowledgements

Permission to conduct this research was given by the Research Council of Zimbabwe, and the Savé Valley Conservancy, with the support of the Zimbabwe Parks and Wildlife Management Authority. Thank you to Chishakwe Ranch for hosting the project team and for providing logistical support. Thanks also to all of the landowners and managers in the conservancy for allowing us to conduct this spoor survey on their properties. Rueben Bote deserves special mention for his excellent track identification.

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

NORTH SVC Species	Survey Area North SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	1639	278.042434	Leopard (Y=0.6993X)	16.96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011
Brown hyaena	1639	92.3646238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484
Cheetah	1639	3.848525992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369
Civet	1639	759.0999784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569
Honey Badger	1639	119.1610431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147
Leopard	1639	291.2825499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916
Lion	1639	188.5777736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906
Spotted hyaena	1639	138.5469357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727
Wild dog	1639	277.0938714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453
African Wildcat	1639	22.06685984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421

SOUTH SVC Species	Survey Area South SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	800.57	27.21437644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111
Brown hyaena	800.57	16.95095785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0
Civet	800.57	233.2660838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667
Honey Badger	800.57	3.887768063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.694444444
Leopard	800.57	73.86759319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.19444444
Lion	800.57	38.98720305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.97222222
Spotted hyaena	800.57	55.9381609	Lion (Y=0.3049X)	6.987291667	144	33	4.363636364	144	5.559513889	22.91666667
Wild dog	800.57	44.0724904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	0

TOTAL SVC Species	Survey Area Total SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	2439	295.7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862
Brown hyaena	2439	106.8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429
Cheetah	2439	3.684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389
Civet	2439	980.1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714
Honey Badger	2439	118.2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448
Leopard	2439	359.11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904
Lion	2439	222.8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204
Spotted hyaena	2439	193.4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293
Wild dog	2439	313.1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808
African Wildcat	2439	21.12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] Trey Morris lion permit 01264D

2 messages

Darbi Rice (b) (6) Thu, Sep 6, 2018 at 12:52 PM
To: "Barry, Anna" <anna_barry@fws.gov>
Cc: Trey Morris (b) (6)

Please send an update on the status of permit number 01264D.

Thank you for your time.

Darbi Rice

Office Manager

(b) (6)

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Barry, Anna <anna_barry@fws.gov> Mon, Sep 10, 2018 at 7:48 PM
To: Darbi Rice (b) (6)

The application is still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] Trey Morris lion permit 01264D

Barry, Anna <anna_barry@fws.gov> Wed, Sep 12, 2018 at 7:50 AM
To: Darbi Rice <d[redacted]

No additional information is needed at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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E-mail: Anna_Barry@fws.gov

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Tue, Sep 11, 2018 at 9:43 AM, Darbi Rice <[redacted] wrote:

> Ms. Barry,
>
> Is there anything else that I can do to help you with the application process?
>
> **Darbi Rice**
>
> **Office Manager**
>
> [redacted]

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From: Barry, Anna <anna_barry@fws.gov>
Sent: Monday, September 10, 2018 6:48 PM
To: Darbi Rice (b) (6)
Subject: Trey Morris lion permit 01264D

The application is still under review.

Sincerely,

Anna Barry

Senior Biologist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

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E-mail: Anna_Barry@fws.gov

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Thank you for your time.

Darbi Rice

Office Manager

(b) (6)

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Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] Trey Morris, lion permit 01264D

2 messages

Darbi Rice <d(b) (6) Tue, Oct 30, 2018 at 1:28 PM
To: "Barry, Anna" <anna_barry@fws.gov>

May I please have a status update on the lion permit 01264D.

Thank you.

Darbi Rice

Office Manager

(b) (6)

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Barry, Anna <anna_barry@fws.gov> Tue, Oct 30, 2018 at 2:00 PM
To: Darbi Rice (b) (6) t>

Hello Darbi,

The application is still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Barry, Anna <anna_barry@fws.gov>

Trey Morris, lion permit 01264D

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Feb 19, 2019 at 1:10 PM
To: Darbi Rice (b) (6)

The application is still under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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On Tue, Feb 12, 2019 at 9:55 AM Darbi Rice <d(b) (6)> wrote:

> May I please have a status update on the lion permit listed above.
>
> Thank you.
>
> **Darbi Rice**
>
> **Office Manager**
>
> (b) (6)

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From: Darbi Rice
Sent: Friday, January 11, 2019 5:00 PM
To: 'Barry, Anna' <anna_barry@fws.gov>
Subject: FW: Trey Morris, lion permit 01264D

Status please?

Darbi Rice

Office Manager

(b) (6)

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From: Barry, Anna <anna_barry@fws.gov>
Sent: Tuesday, October 30, 2018 1:20 PM
To: Darbi Rice (b) (6)
Subject: Trey Morris, lion permit 01264D

Darbi,

Prior to March 12, 2018, it did not take this long for our office to process applications for the import of sport-hunted trophy and now with the requirement of providing enhancement findings on an application-by-application basis the process has been delayed further. At this time no additional information is needed to complete Mr. Morris's application.

Sincerely,

Anna Barry

Senior Biologist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

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On Tue, Oct 30, 2018 at 2:03 PM, Darbi Rice (b) (6) wrote:

> Does it normally take this long? Is there anything I can do or that you need from me to expedite this process?
>
> **Darbi Rice**
>
> **Office Manager**
>
> (b) (6)
>
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From: Barry, Anna <anna_barry@fws.gov>
Sent: Tuesday, October 30, 2018 1:01 PM
To: Darbi Rice <(b) (6)
Subject: Trey Morris, lion permit 01264D

Hello Darbi,

The application is still under review.

Sincerely,

Anna Barry

Senior Biologist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

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On Tue, Oct 30, 2018 at 1:28 PM, Darbi Rice (b) (6) > wrote:

> May I please have a status update on the lion permit 01264D.
>
> Thank you.
>
> **Darbi Rice**
>
> **Office Manager**
>
> (b) (6)
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CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

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August 28, 2019

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

RCVD SEP 6 2019

RE: PRT No. MA01264D / Lion Trophy, Zimbabwe / Brandon Trey Morris

Dear Chief Cogliano:

As supplement to our existing application. Please find enclosed a notice of representation for Brandon Trey Morris's application for a Lion (Panthera leo) Trophy from Zimbabwe.

PRT No. MA01264D

Please include Conservation Force in all correspondence regarding this permit.

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

Sincerely,

John J. Jackson III

encl: Notice of Representation, Brandon Trey Morris

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

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: Brandon Trey Morris

Date: 8/20/19

Re: [EXTERNAL] RE: Trey Morris, lion permit 01264D

Barry, Anna <anna_barry@fws.gov>
Mon 6/1/2020 5:43 PM
To: Darbi Rice (b) (6) Tammy Piker <permits@conservationforce.org>
Cc: Trey Morris (b) (6)
Bcc: Brisendine, Amy <amy_brisendine@fws.gov>

The application is still under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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From: Darbi Rice (b) (6)
Sent: Monday, June 1, 2020 2:50 PM
To: Tammy Piker <permits@conservationforce.org>; Barry, Anna <anna_barry@fws.gov>
Cc: Trey Morris (b) (6)
Subject: [EXTERNAL] RE: Trey Morris, lion permit 01264D

Tammy,

I still have not heard from anyone. What is the status on Mr. Morris's lion permit?

Thank you.

Darbi Rice
Office Manager
(b) (6)

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From: Tammy Piker <permits@conservationforce.org>
Sent: Wednesday, January 22, 2020 9:25 AM
To: Anna_Barry@fws.gov
Cc: Trey Morris (b) (6) Darbi Rice (b) (6)
Subject: Trey Morris, lion permit 01264D

Ms. Barry: I am attempting to discover the status of the referenced lion permit. Any information that you give to me would be greatly appreciated. From what I can see, it appears that this permit application was forwarded to your office sometime BEFORE October 2018. Thank you for your cooperation.

Tammy L. Piker

Conservation Permitting Division
CONSERVATION FORCE
P.O. Box 278
Metairie, LA 70004-0278
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

---------- Original Message ----------
From: Darbi Rice (b) (6)
To: "Barry, Anna" <anna_barry@fws.gov>
Cc: Rachel Brechbuehler <permits@conservationforce.org>, Trey Morris (b) (6)
Date: January 21, 2020 at 4:33 PM
Subject: FW: Trey Morris, lion permit 01264D

I have emailed Rachel a few times with no response. I was not sure if she was out of the office.

Could you please give me a status update on the attached lion permit.

Thank you.

Darbi Rice
Office Manager
(b) (6)

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From: Barry, Anna <anna_barry@fws.gov>
Sent: Tuesday, February 19, 2019 12:11 PM
To: Darbi Rice (b) (6)
Subject: Trey Morris, lion permit 01264D

The application is still under review.

Sincerely,

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Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
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> May I please have a status update on the lion permit listed above.
>
> Thank you.
>
> **Darbi Rice**
> **Office Manager**
> (b) (6)
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> (b)(6)
>
> ---
>
> **From:** Darbi Rice
> **Sent:** Friday, January 11, 2019 5:00 PM
> **To:** 'Barry, Anna' <anna_barry@fws.gov>
> **Subject:** FW: Trey Morris, lion permit 01264D
>
> Status please?

Darbi Rice
Office Manager
(b) (6)

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To: Darbi Rice (b) (6)
Subject: Trey Morris, lion permit 01264D

Darbi,

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Sincerely,

Anna Barry
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USFWS/Division of Management Authority
Branch of Permits, MS: IA
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On Tue, Oct 30, 2018 at 2:03 PM, Darbi Rice (b) (6) wrote:

Does it normally take this long? Is there anything I can do or that you need from me to expedite this process?

Darbi Rice
Office Manager
(b) (6)

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From: Barry, Anna <anna_barry@fws.gov>
Sent: Tuesday, October 30, 2018 1:01 PM
To: Darbi Rice <(b) (6)
Subject: Trey Morris, lion permit 01264D

Hello Darbi,

The application is still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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On Tue, Oct 30, 2018 at 1:28 PM, Darbi Rice (b) (6) wrote:

> May I please have a status update on the lion permit 01264D.
>
> Thank you.
>
> **Darbi Rice**
> **Office Manager**
> (b) (6)

---

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Tammy L. Piker
Conservation Permitting Division
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[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

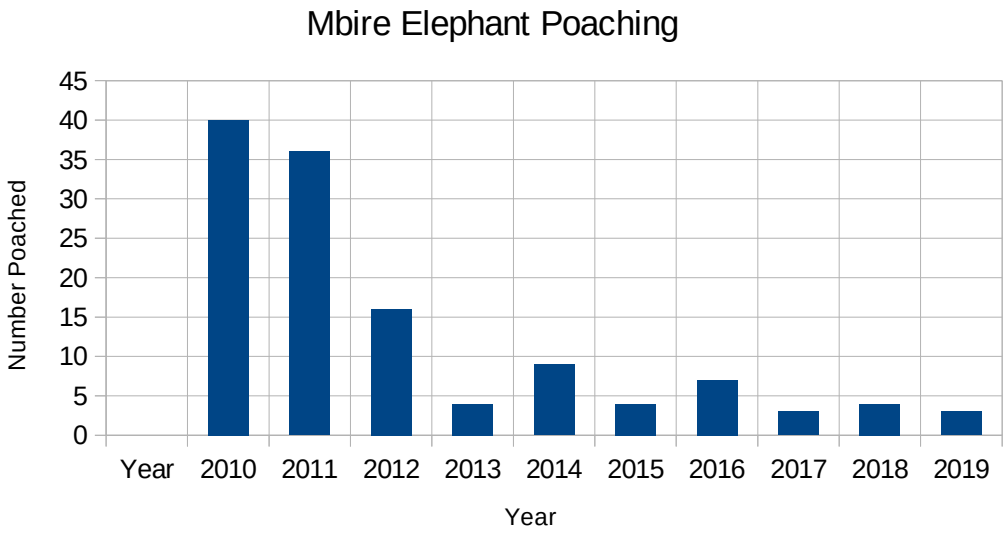

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

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April 21, 2020

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE
Date: 2020.08.13 14:51:50 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING Digitally signed by JENNA KING
Date: 2020.08.13 14:42:57 -04'00'

To: Permit File PRT- 01264D

Enhancement Finding

Applicant: Brandon Trey Morris (PRT–01264D)

Introduction

Brandon Trey Morris submitted an application on July 31, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken on January 06, 2018, from the Savé Valley Conservancy (SVC), Senuko Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Brandon Trey Morris hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Morris' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Morris himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Morris supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Morris, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Morris in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Morris' hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Morris' trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Morris' legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Morris, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Morris' legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Morris submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Morris plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Morris' trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Morris' permit request, we find that the expertise, facilities, or other resources available to Mr. Morris appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Morris' participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Morris' permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Morris on January 06, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Brandon Trey Morris of Shreveport, Louisiana.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / jan/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:12:55 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 01264D, Brandon Trey Morris, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 14:53:03 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA01264D-0

Effective: 08/13/2020 Expires: 08/12/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.13 16:12:28 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

BRANDON TREY MORRIS
(b) (6) [redacted]
SHREVEPORT, LA 71101
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Wade	Mark	A	

(b) (6)

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Fairbanks	Alaska	99709	Fairbanks N Star Borou	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature o (b) (6) (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Aug 3, 2018

Please continue to next page

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

Mark Wade
(b) (6)
Fairbanks, Alaska 99709

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

Mark Wade
(b) (6)
Fairbanks, Alaska (b) (6)

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

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

Panthera Leo / African Lion

b. Sex (if known). Male

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

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

N/A

b. Date wildlife is to be hunted:

N/A

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

N/A

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

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

Zimbabwe / Masvingo Province
Area / Save Valley Conservancy , Msaise Ranch
Nearest City / Masvingo GIS VC 810719
GIS VC 810719

b. Date wildlife was hunted:

23 June 2018

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

DesFountain & Jones Safaris Pvt/Ltd
PH Dale DesFountain PH licence number 90

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

Harare / Zimbabwe

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

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

Name:	Lyn Duncan
Business Name:	LD Forwarding Co. Ltd
Address:	P.O.Box GD 467 , Greendale
City:	Harare
State/Province:	Zimbabwe
Country, Postal Code:	

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

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

Populations are in Excess of carrying capacities, Wildebeest , Zebra and Eland numbers are depleting because of the booming lion populations. Please see attached page

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

Please see attached page. I have no information how specifically the funds were used.

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

A team of 38 permanent Game Scouts are employed to curb poaching. Several community projects are being funded by the safari operator, with focus on school support and education teaching wildlife management and conservation. There are also agricultural projects going on to help add a source of employment income to families. See attached.

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: _____ Date: 8/3/2018

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

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

Dallas/Ft. Worth, Texas
1639 West 23, Suite 105
DFW Airport, Texas 75261
(972) 574-3254

Mark Wade
(b) (6)
Fairbanks, Alaska 99709

July 20, 2018

Re: Question 9 on Federal Fish and Wildlife Permit Application Form

I hunted African lion with Desfountain Safaris from June 20 to June 24 in the Save Valley Conservancy in the Msaise Ranch of the Masvingo Province. During that time, we saw several lions including many mature male lions. Indeed, in my opinion, that area had too many lions as we saw tracks everywhere it seemed. I harvested a 9-10 year old male lion on June 23, 2018. We saw several mature male lions during this hunt.

Every night we heard lions roaring near our camp coming from several different directions, and they had a female lion living in the area coming into the skinning area at night looking for food. In the time we were there, we did not see this female lion come into camp, but we saw photos. But we did see lions while driving around, and tracks were seen around several waterholes frequently. As the outfitter used motion detector cameras to monitor the animals, we frequently saw pictures of groups of females and several males in both groups and alone. According to Mr. DesFountain, their wildebeest, eland, and zebra populations are in decline because he feels an over-population of lions. Based on my observations, I would agree. There clearly was a lion presence in this area.

My fee for this hunt was $45,000. A portion of this fee went to the Save Valley Conservancy Fund, as well as taxes for the Zimbabwe government. You would have to contact Mr. Desfountain about the specifics of how much the Conservancy Fund receives for this type hunt.

In terms of other activities for conservation, this outfitter pays considerable monies to operate an anti-poaching program to prevent illegal taking of game. We often encountered men walking the roads who were making routine checks for poachers or illegal activities. We delivered food to the outer camps where the rangers stayed, as well as brought working radios to them to insure communications. Snares were found periodically as we walked through the brush, and of course these snares were destroyed. The area is flown frequently with an airplane and drones to take game counts and monitor animal movements. They employ 38 full time anti-poaching scouts walking the perimeter and areas.

All in all, I was very impressed in how this operation worked with the local population as well as spending considerable resources to protect their wild game and prevent poaching. Fundings for school education on wildlife conservancy and support for local farms to provide employment to the people in that area appeared ongoing.

Another regular activity we observed was to insure water pumps from the Save River were operating as we often stopped to turn off and turn on water pumps into the water holes to guarantee water was available to the local game. These activities, although time consuming, supported both the predators and other species of a viable and valuable water resource. This outfitter had several dozen water pumps, solar pumps, and miles of pipeline to support and repair to maintain this operation.

My impression is that with the activities we witnessed, this particular area of Zimbabwe is doing quite well in protecting and supporting the wildlife there, and recognizes that resources and time are required to sustain and conserve the great wild species of animals we saw. As they continue to monitor the

animal populations subject to lion predation, a possible increase in permits may be required in the future.

Please feel free to contact me for any further information or help you might need to gather facts concerning the lion populations in this region of Zimbabwe.

Many thanks.

(b) (6)

Mark Wade
Fairbanks, Alaska

~~050~~ 001711

NP/CITES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PHL: .....
PHL 29
Amount Paid$400
Date 20-12-17
Rec no. H10R072043

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to A Tshabangu

of Msaise

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section Msaise of the Masvingo Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-18

and ~~31-12-18~~ (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
~~Antbear~~		~~1~~	~~Francolin~~		~~700~~	~~Klipspringer~~		~~1~~
~~Baboon~~		~~20~~	~~Goose~~		~~300~~	~~Kudu (m)~~		~~15~~
~~Buffalo (m)~~		~~15~~	~~Genet cat~~		~~5~~	~~Leopard (m)~~		~~1~~
Bushbuck (m)		10	Giraffe (m)		7	Lion (m)		1
Bushpig		40	Grysbok (m)		2	Mongoose		2
~~Caracal~~		~~2~~	Guinea fowl	1000		Nyala (m)		2
~~Civet cat~~		~~6~~	~~Hippopotamus~~		~~1~~	~~Pigeons/ Doves~~		~~2000~~
Duiker (m)		8	Honey Badger		2	Porcupine		3
Eland (m)		8	S. Hyena		2	Sable (m)		1
Elephant (m)		2	Impala (m)		100	Serval		5
Elephant T/L		2	Jackal S/S		10	Warthog (m)		30
Waterbuck (m)		5	Wildcat		5	Wildebeest (m)		25
Zebra		35	XXXX

050 001711

NP/CITES FORM 10

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HUNTING PERMIT
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Baboon		20	Goose		300	Kudu (m)		15
Buffalo (m)		15	Genet cat		5	Leopard (m)		1
Bushbuck (m)		10	Giraffe (m)		7	Lion (m)		1
Bushpig		40	Grysbok (m)		2	Mongoose		2
Caracal		2	Guinea fowl	1000		Nyala (m)		2
Civet cat		6	Hippopotamus		1	Pigeons/ Doves		2000
Duiker (m)		8	Honey Badger		2	Porcupine		3
Eland (m)		8	S. Hyena		2	Sable (m)		1
Elephant (m)		2	Impala (m)		100	Serval		5
Elephant T/L		2	Jackal S/S		10	Warthog (m)		30
Waterbuck (m)		5	Wildcat		5	Wildebeest (m)		25
Zebra		35	XXXX

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] CITES application

1 message

Mark Wade (b) (6) Mon, May 13, 2019 at 4:30 PM
To: anna_barry@fws.gov

Ms. Barry,

I left a voicemail message on your phone. I put in an application for a CITES permit almost a year ago, and have yet to hear back in any way. No confirmation of receipt or status report. I called your office today, and was told my permit number was 02727D.

Could you provide me with some feedback on my application if possible. I was under the impression that I was able to qualify for a CITES permit, and as of yet, it has been almost a year since submitting my application and I have had no word on the status.

Thank you for your time

--
Mark Wade
Fairbanks, Alaska
(b) (6)

Barry, Anna <anna_barry@fws.gov>

Mark Wade PRT #02727D

1 message

Barry, Anna <anna_barry@fws.gov> Tue, May 14, 2019 at 12:55 PM
To: Mark Wade (b) (6)
Cc: "Brisendine, Amy" <amy_brisendine@fws.gov>

Dear Mr. Wade,

The following is in response to your phone call yesterday and your e-mail message below.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Mon, May 13, 2019 at 4:31 PM Mark Wade <(b) (6)> wrote:

> Ms. Barry,
>
> I left a voicemail message on your phone. I put in an application for a CITES permit almost a year ago, and have yet to hear back in any way. No confirmation of receipt or status report. I called your office today, and was told my permit number was 02727D.

Could you provide me with some feedback on my application if possible. I was under the impression that I was able to qualify for a CITES permit, and as of yet, it has been almost a year since submitting my application and I have had no word on the status.

Thank you for your time

--
Mark Wade
Fairbanks, Alaska
(b) (6)

DEPARTMENT OF THE INTERIOR Mail

Barry, Anna <anna_barry@fws.gov>

Mark Wade PRT #02727D

1 message

Barry, Anna <anna_barry@fws.gov> Tue, May 14, 2019 at 3:30 PM
To: Mark Wade <(b) (6)

Yes we were issuing permits, but, we had to reassess after the 2017 coup d'etat.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Tue, May 14, 2019 at 3:20 PM Mark Wade (b) (6) wrote:

> Thank you. Are any applications being approved for importation of lion coming from Zimbabwe? I was told they were being given. Thus the reason I accepted the opportunity to hunt this animal that was, as told to me, was becoming a problem to local people there.
>
> Mark Wade
>
> On May 14, 2019, at 10:29 AM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> > Dear Mr. Wade,
> >
> > Whenever an application is received in our office and place in our system an acknowledgement letter is generated, which is then e-mailed to the applicant. This letter provides the date the application was received in our office, the PRT #, and the check/money order information. I will request that one of my co-workers forward it to you before the end of the day.
> >
> > In regards to receiving an update, I will request the person assigned to your application to contact you when the application is submitted for review and signature to their supervisor.
> >
> > Sincerely,
> >
> > Anna Barry
> > Supervisory Policy Specialist

USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Tue, May 14, 2019 at 2:00 PM Mark Wade (b) (6) wrote:

> Thank you for your reply. Will there be any process to where I will be notified of any decision that affects my application status in any direction? As it stands, I was never notified that my application has been received, reviewed or placed in a pending status.
>
> Thank you for your time
>
> Mark Wade
>
> On May 14, 2019, at 8:55 AM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> > Dear Mr. Wade,
> >
> > The following is in response to your phone call yesterday and your e-mail message below.
> >
> > As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.
> >
> > The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.
> >
> > Sincerely,
> >
> > Anna Barry
> > Supervisory Policy Specialist
> > USFWS/Division of Management Authority
> > Branch of Permits, MS: IA
> > 5275 Leesburg Pike

Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Mon, May 13, 2019 at 4:31 PM Mark Wade <(b) (6) wrote:

> Ms. Barry,
>
> I left a voicemail message on your phone. I put in an application for a CITES permit almost a year ago, and have yet to hear back in any way. No confirmation of receipt or status report. I called your office today, and was told my permit number was 02727D.
>
> Could you provide me with some feedback on my application if possible. I was under the impression that I was able to qualify for a CITES permit, and as of yet, it has been almost a year since submitting my application and I have had no word on the status.
>
> Thank you for your time
>
> --
> ***Mark Wade***
> ***Fairbanks, Alaska***
> (b) (6)

Barry, Anna <anna_barry@fws.gov>

Mark Wade PRT #02727D

1 message

Barry, Anna <anna_barry@fws.gov> Tue, May 14, 2019 at 2:29 PM
To: Mark Wade (b) (6)
Cc: "Brisendine, Amy" <amy_brisendine@fws.gov>

Dear Mr. Wade,

Whenever an application is received in our office and place in our system an acknowledgement letter is generated, which is then e-mailed to the applicant. This letter provides the date the application was received in our office, the PRT #, and the check/money order information. I will request that one of my co-workers forward it to you before the end of the day.

In regards to receiving an update, I will request the person assigned to your application to contact you when the application is submitted for review and signature to their supervisor.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Tue, May 14, 2019 at 2:00 PM Mark Wade (b) (6) wrote:

> Thank you for your reply. Will there be any process to where I will be notified of any decision that affects my application status in any direction? As it stands, I was never notified that my application has been received, reviewed or placed in a pending status.
>
> Thank you for your time
>
> Mark Wade
>
> On May 14, 2019, at 8:55 AM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> Dear Mr. Wade,

The following is in response to your phone call yesterday and your e-mail message below.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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On Mon, May 13, 2019 at 4:31 PM Mark Wade (b) (6) wrote:

> Ms. Barry,
>
> I left a voicemail message on your phone. I put in an application for a CITES permit almost a year ago, and have yet to hear back in any way. No confirmation of receipt or status report. I called your office today, and was told my permit number was 02727D.
>
> Could you provide me with some feedback on my application if possible. I was under the impression that I was able to qualify for a CITES permit, and as of yet, it has been almost a year since submitting my application and I have had no word on the status.
>
> Thank you for your time
>
> --
> ***Mark Wade***
> ***Fairbanks, Alaska***
> ***907-479-2663***

Braxton, Ailteas <ailteas_braxton@fws.gov>

Sport Hunted trophy import permit application.....02727D

1 message

Braxton, Ailteas <ailteas_braxton@fws.gov> Thu, May 16, 2019 at 9:08 AM
To: (b) (6)

Below is your acknowledgement letter.

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

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

19-5-16_02727D_EMAILackltr.pdf
77K

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

Date: 05/16/2019

MARK A. WADE
(b) (6)
FAIRBANKS, AK 99709
U.S.A.

Dear Applicant,

Thank you for submitting an application (Form 3-200) to the U.S. Fish and Wildlife Service. The application you submitted was received by the Division of Management Authority on 08/14/2018; check number 240324 accompanied the application for AFRICAN LION. (If you are exempt from the processing fee, the above will be blank.) Your application has been assigned the following PRT number (identification number): **US02727D/9 and we are beginning the review process.

When can I expect to receive my permit? It is the U.S. Fish and Wildlife Service's goal to provide the quickest processing time possible. While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 and 90 days to process.

Why does it take so long? Many statutory and procedural requirements must be considered when reviewing an application requesting a permit, including in some case requirement to publish the receipt of applications in the Federal Register and/or the review by other Service offices. Once a staff member has an opportunity to completely review your application, you may be contacted if further information is required. If complete answers were provided for all relevant questions on the application form, it may not be necessary to contact you before making a final decision on your application.

Can I contact you? While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. This letter confirms we have your application and will begin processing it as quickly as possible. Our office processes over 6,000 applications and responds to over 200,000 telephone calls and e- mails annually. We need time to review your application to ensure it is processed as quickly as possible.

What if I need to give you more information? If you have specific information that needs to be provided so that we can successfully complete the processing of your application, please feel free to mail (address above) or fax (703-358-2281) the additional information to our office. Please include your PRT number, name, and daytime telephone number on all correspondence. If it is necessary to call our office (800-358-2104), please speak to the staff member on duty for the day. Any information you provide will be passed on to the staff member assigned to your file. If the assigned staff member needs further information, they will contact you.

Again, thank you for your application and your patience.

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 13:19:53 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 02727D

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 13:14:05 -04'00'

Enhancement Finding

Applicant: Mark A. Wade (PRT–02727D)

Introduction

Mark A. Wade submitted an application on August 14, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken on June 23, 2018, from the Savé Valley Conservancy (SVC), Msaise Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Mark A. Wade hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Wade's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Wade himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Wade supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Wade, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Wade in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Wade's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Wade's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Wade's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Wade, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Wade's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Wade submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Wade plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Wade's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Wade's permit request, we find that the expertise, facilities, or other resources available to Mr. Wade appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Wade's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Wade's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Wade on June 23, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Mark A. Wade of Fairbanks, Alaska.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:13:47 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 02727D, Mark A. Wade, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:12:19 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA02727D-0
Effective: 08/13/2020 Expires: 08/12/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.14 07:16:57 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
MARK A. WADE
(b) (6)
FAIRBANKS, AK 99709
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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September 11, 2018

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

RCVD SEP 13 201

RE: Import Application of Zimbabwe Lion Trophy for Todd Fry

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zimbabwe for Todd Fry. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

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

Sincerely,

John J. Jackson III

encl:

- Todd Fry's Lion Permit Application, 100.00 Check and Notice of Representation

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

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev 08/31/2020

RCVD SEP 13 2018

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c Middle name or initial	1.d. Suffix
Fry	Todd	D.	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6) [redacted]			

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Boerne	Texas	78006	Kendall	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.

(b) (6) [redacted] 7-25-18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

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

   Todd Fry - (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X ____ Yes ____

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

4. For each trophy to be imported, provide:

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

Lion

   b. Sex (if known). Male

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

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

Zimbabwe - Bubye Valley

   b. Date wildlife is to be hunted: 10/22/18 to 11/8/18

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

Mazunga Safaris - Pete Fick. 8 Norfolk Rd. Hillside, Bulawayo, Zimbabwe

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

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

   b. Date wildlife was hunted:

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

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

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

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

Name: PETE FICK
Business Name: MAZUNGA SAFARIS
Address: 8 NORFOLK RD
City:
State/Province: BULAWAYO, ZIMBABWE
Country, Postal Code:

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

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

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

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

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

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

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

    Taxidermist/Broker's signature: _____ Date: _____

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

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

    Applicant's signature: (b) (6) Date: 7-25-18

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

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

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: TODD D FRY

Date: 7-25-18

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

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SHANE MAHONEY
RENEE SNIDER

September 24, 2019

TRANSMISSION VIA EMAIL: amy_brisendine@fws.gov
Ms. Amy Brisendine
U.S. Fish and Wildlife Service
Division of Managemen Authoritye (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virgina 22041

RE: SUPPLEMENT TO APPLICATION

PRT #: 08061D

APPLICANT NAME: TODD FRY

Dear Ms. Brisendine:

Pursuant to our phone conversation we are supplementing the above captioned application for a lion to also include a lioness that was also taken on the same safari, in the same location and with the same operator as follows:

COUNTRY:	Zimbabwe
SPECIE:	Panthera Leo Melanochaita – LIONESS
DATE OF HUNT:	10/22/2018 to 11/08/2018
HUNTING WITH:	Mazunga Safaris
CONSERVANCY:	Bubye Valley Conservancy

Attached please find Hunting Permit No. 001902 for the Lioness, issued by Zimbabwe Parks and Wildlife Management Authority, dated 09/08/2018.

If you have any question about this supplement, please do not hesitate to contact us.

Regards,

/s/ Emma C. Sampson
Emma C. Sampson
CONSERVATION FORCE
Permits Department

Enclosures: Permit to hunt; Biologist's Lioness report
cc Client

Bubye Valley Conservancy
Motivation for the hunting of adult lionesses

Blondie Leathem, General Manager, Bubye Valley Conservancy
Email: mazunga@bvczim.com

The Bubye Valley Conservancy (BVC) is one of largest private wildlife areas in Zimbabwe with a total area of approximately 3400 km^2. Originally a cattle ranch, the BVC was established in 1994 through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting. In 1999, thirteen lions of Namibian origin were introduced to the conservancy from Pilansberg National Park, South Africa. An additional four animals were recorded to have broken in between 1999 and 2003. With abundant prey and the protection from human-wildlife conflict provided by the electrified perimeter fence, the lion population increased at a rate of 25% per annum reaching an estimated population size of 500 individuals in 2013 (Wijers, 2016). The rapid increase in the lion population has had detrimental effects on prey populations particularly wildebeest, eland and giraffe which have recorded declines exceeding 60% (Wijers & Gush, 2018b).

The lion population explosion observed in the BVC likely emanated from the lack of natural regulatory processes that are known to limit population growth in larger unfenced systems. Miller et al. (2013) suggested that management interventions that are implemented to control population growth in smaller, fenced reserves should aim to mimic the outcomes of natural processes particularly regarding reproductive, survival and dispersal schedules. Given the size of the BVC lion population, it would be logistically and financially unfeasible to alter reproductive schedules using contraceptive methods. Furthermore, contraception has been reported to result in fragmentation of prides into smaller groups and single females which can further impact predator prey dynamics through increased predation (Lehmann et al., 2008; Miller et al., 2013). Options for manipulating survival and dispersal rates include translocation, euthanasia and hunting. Although translocation remains an option for BVC management, previous offers and attempts to move animals have proven this to be an unlikely solution due to highly restrictive government policies as well as the limited number of areas willing to receive lions. Trophy hunting and euthanasia are therefore the only reasonable methods of lion population control for BVC.

Adult female lions represent approximately 44% of the total BVC lion population (Wijers & Gush, 2018a). Although the majority of adult females exist in large, stable prides, several lone individuals have been observed. In addition, GPS collar data and sightings information from single lionesses that have either split from their native prides, or that have never been part of a pride, has shown that these individuals typically remain alone and form smaller groups with their offspring. Removal of lone, non-lactating lionesses has therefore been identified as an important management objective aimed at reducing the overall lion population, recruitment and predation. Hunting of lionesses is a preferable method of removal to euthanasia as the income generated from each hunt will be used to fund the conservancy's lion research and anti-poaching projects which are vital for effective wildlife management and protection. Furthermore, the allocated lioness hunting quota represents only a small fraction (15-20%) of the ideal required management offtake. The hunting of selected lionesses will benefit the conservancy ecologically as well as financially helping to ensure continued sustainable management of BVC's wildlife.

References

Lehmann, M. B., Funston, P. J., Owen, C. R., and Slotow, R. (**2008**). "Feeding behaviour of lions (Panthera leo) on a small reserve," African J. Wildl. Res., **38**, 66–78.

Miller, S. M., Bissett, C., Burger, A., Courtenay, B., Dickerson, T., Druce, D. J., Ferreira, S., et al. (**2013**). "Management of Reintroduced Lions in Small, Fenced Reserves in South Africa: An Assessment and Guidelines," South African J. Wildl. Res., **43**, 138–154.

Wijers, M. (**2016**). BVC Lion Population Survey 2016. Unpublished report, Bubye Valley Conservancy.

Wijers, M. and Gush, W. (**2018a**). BVC Lion Call-up Survey Report 2018. Unpublished report, Bubye Valley Conservancy

Wijers, M. and Gush, W. (**2018b**). BVC Herbivore Population Survey 2018. Unpublished report, Bubye Valley Conservancy

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] FRY, TODD - SUPPLEMENT APPLICATION

1 message

Emma C. Sampson <permits@conservationforce.org> Tue, Sep 24, 2019 at 6:18 PM
To: amy_brisendine@fws.gov
(b) (6)

Dear Ms. Brisendine,

For appropriate action, please see enclosed letter to Supplement Application to Import Lioness from Zimbabwe.

Thank you for your prompt attention to this matter,

Regards,

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

2 attachments

2019.09.24 Lioness Suppl Appl.docx
38K

BVC - Hunt of Lioness.pdf
1041K

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
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RENEE SNIDER

June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

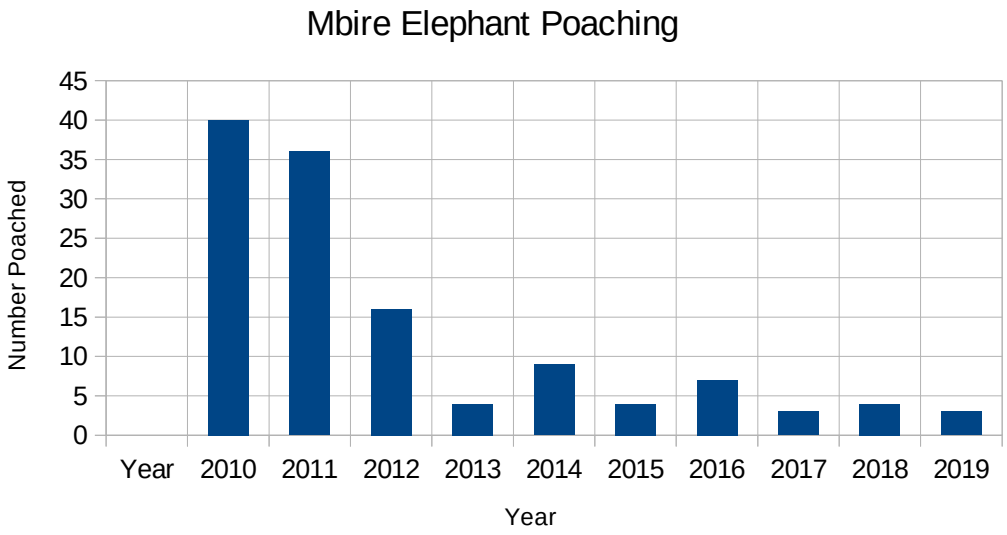

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

From: King, Jenna D
To: (b) (6)
Cc:
Subject: CITES Permit Application # 08061D
Date: Thursday, August 13, 2020 6:04:59 PM

Hi Mr. Fry,

This email is in regard to your CITES permit application #08061D to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 10/22/2018 and 11/8/2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
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5275 Leesburg Pike, MS: IA; 2W059D
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From: Todd Fry
To: King, Jenna D
Cc: Brisendine, Amy
Subject: [EXTERNAL] Re: CITES Permit Application # 08061D
Date: Thursday, August 13, 2020 7:08:48 PM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello Jenna,

The lion was taken November 3, 2018

Please let me know if you are need of any further information.

Thank you and have a nice evening,

Todd D. Fry

On Aug 13, 2020, at 5:04 PM, King, Jenna D <jenna_king@fws.gov> wrote:

Hi Mr. Fry,

This email is in regard to your CITES permit application #08061D to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 10/22/2018 and 11/8/2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by

this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
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United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.14 13:28:27 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 08061D

JENNA KING Digitally signed by JENNA KING Date: 2020.08.14 07:49:52 -04'00'

Enhancement Finding

Applicant: Todd D. Fry (PRT– 08061D)

Introduction

Todd D. Fry submitted an application, received by the Service on September 13, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken November 03, 2018, from the Bubye Valley Conservancy, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Todd D. Fry hunted in the Bubye Valley Conservancy (BVC) in Zimbabwe. Based on information submitted with the permit application, the Bubye Valley Conservancy (BVC) is reportedly one of largest private wildlife areas in Zimbabwe with a total area of approximately 3,400 km^2. The land that now occupies BVC was historically a cattle ranch, and in 1994 the BVC was established and land use converted through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting.

In evaluating whether the importation of Mr. Fry's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Bubye Valley Conservancy and Mr. Fry himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Save Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species.

Sport hunting was essential for the successful transition of the BVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the

conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over US $100,000 per year. The BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but it is also empowered by job opportunities created both within these communities, as well as in the BVC (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Fry supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Fry, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Fry in the hunting and subsequent import of the trophy lion he harvested in the BVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Fry's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these

authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Fry's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Fry's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Fry, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, reportedly, USD 590,000 was spent on anti-poaching efforts by BVC alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Fry's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Fry submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Fry plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Fry's trophy lion increases the funds available to the Zimbabwe Government and BVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Fry's permit request, we find that the expertise, facilities, or other resources available to Mr. Fry appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Fry's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Fry's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Fry on November 03, 2018, from the Bubye Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Todd D. Fry of Boerne, Texas.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The hushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 14, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.14 07:51:32 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 08061D, Todd D. Fry, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.14 13:29:27 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA08061D-0
Effective: 08/14/2020 Expires: 08/13/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.14 14:27:04 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD D. FRY
(b) (6)
BOERNE, TX 78006
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD OCT 16 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Somers	Scott	Ross	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Davison	Michigan	48423	Genesee	U.S.A.

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

10/03/2018

Please continue to next page

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

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

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

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

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

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

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

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

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

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

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

Scott Somers (b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

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

Panthera Leo (African Lion)

   b. Sex (if known). Male

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

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

   b. Date wildlife is to be hunted:

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

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

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

Zimbabwa / Save Conservence / Chishakwe Ranch / Masvingo Province

   b. Date wildlife was hunted:

6/9/2018

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

John Greeff, PH No. 127 (14 Clark Road Suburbs, Bulawayo, Zimbabwe)
Passing Cloud Safaris T/A Pro Safis Africa 20 Haddon Avenue, Khumalo, Bulawayo, Zimbabwe

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

Out Bound Cargo Trophy Exporters
5 Grantham Road Belmont, Bulawayo, Zimbabwe

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

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

Name:	
Business Name:	Out Bound Cargo Trophy Exporters
Address:	5 Grantham Road
City:	Belmont
State/Province:	Bulawayo
Country, Postal Code:	Zimbabwe

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

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

Yes. Attached Lion Management Plan

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

Trophys Fees listed on Hunting Return Form TRA52
Also see "Pro Safaris Africa & Documentation

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

See Lion Management Plan

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: (b) (6) Date: 10/03/2018

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

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

Passing Cloud Safaris
t/a Pro Safaris Africa
ZIMBABWE

17 September 2018

US Fish and Wildlife

RE - SUPPORTING DOCUMENTATION FOR LION IMPORTATION– MR SCOTT ROSS SOMERS

This letter serves to confirm that the Mr Somers hunted with Pro-Safaris Africa on Chishakwe Ranch within the Save Valley conservancy in south east Zimbabwe.

Chishakwe ranch is 100% dependant on hunting income. Earnings from the hunts conducted for the 2018 season to date is $168,964.50 (One hundred and sixty eight thousand, nine hundred and sixty four dollars and fifty cents).
Of this amount the Lion portion is 23% of the value, which is $38,861.84 (Thirty eight thousand, eight hundred and sixty one dollars and eighty four cents only).

The money is spent on the management of the area. This includes staff wages, anti-poaching, water pumping, road maintenance, pipeline maintenance, security and general area maintenance.

Chishakwe employs 32 staff members with 210 Dependants in total.

There are six water points that are pumped from a dam within the ranch with approximately 45km of pipelines that need to be maintained.

Chishakwe receives one Lion tag and this hunt contributes 23% of total income. Losing the Lion tag has devastating implications for the sustainability of the area.

Lion in Zimbabwe have to be of 5 years or older of age. This is well documented.

For any further details, please don't hesitate to contact us.

Sincerely Yours

Louis Muller
Managing Director
Pro Safaris Africa

No 3 Aida Court, Windsor Park Complex, Famona Bulawayo, Zimbabwe
☎: +263-9-71368/9, E-Mail: info@pro-saf.com

ALL ADDRESSING QUESTION 7 ALSO QUESTION 9

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4754/2018

(IV CITES FORM 2)

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

Permit/Certificate No ZW/4754/2018

[X] Export
[ ] Re-Export
[ ] Import
[ ] Other

Original

2. Valid Until: 25-01-2019

1. Importer (name and address): SCOTT R SOMERS

(b) (6) [redacted]
DAVISON
MI 48423
U.S.A

3a. Country Of Import: United States Of America

4. Exporter (name, address and country Zimbabwe
PRO SAFARIS
P.O.BOX AC 577 ASCOT
BULAWAYO
ZIMBABWE

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse): H

5b. Security stamp no.: 129647C

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

6a. Declaration by Exporter or Agent
I hereby declare that I am aware of the provision of the Convention contained in the Statutory Instrument 76 of 1998, for the purpose of Exporting / Re-exporting / Importing the Wildlife listed below
The total value of this consignment is:
$US .....Signature of applicant (b) (6) [redacted]

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Giraffa camelopardalis	Giraffe	[illegible]	NE W	4 no	n/a	n/a	n/a
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Panthera leo	lion	[illegible]	II W	1 no	n/a	n/a	n/a
Panthera leo	lion	full mount skin	II W	1 no	n/a	n/a	n/a
Equus burchelli	Zebra	skins	NE W	2 no	n/a	n/a	n/a

12. Country of origin:	Permit No	Date of issue	12a. Country of last re-export

PERMITS DIVISION
ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
P.O. BOX 2283, BULAWAYO
TEL/FAX: 09 883386

13. This permit is issued by

Place: Bulawayo Date: 25-07-2018 Security stamp, signature and official seal:

14. Exchange Control Information
CD1 number.....for
CD1 not applicable to export (delete)

(Date stamp and signature of authorized official):.....
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority/Inspector

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity

17. Bill of lading/air waybill number:

Port of export Date Signature

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4753/2018

NP CITES FORM 2

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

Permit/Certificate No ZW/4753/2018

[X] Export
[ ] Re-Export
[ ] Import
[ ] Other

Original

2. Valid Until: 25-01-2019

3. Importer (name and address): SCOTT A SOMERS
(b) (6) [redacted]
DAVISON
MI 48420
U.S.A

3a. Country Of Import: United States Of America

4. Exporter (name, address and country Zimbabwe
PRO SAFARIS
P.O BOX AC 577 ASCOT
BULAWAYO
ZIMBABWE

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse): H

5b. Security stamp no. 1296489

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

6a. Declaration by Exporter or Agent
I hereby declare that I am aware of the provision of the Convention contained in the Statutory Instrument 76 of 1998, for the purpose of Exporting / Re- exporting / Importing the Wildlife listed below
The total value of this consignment is:
$US 12,225.00 ..... Signature of applicant (b) (6) [redacted]

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Syncerus caffer	Buffalo	backskin	NE W	1 no	n/a	n/a	n/a
Syncerus caffer	Buffalo	feet (front	NE W	2 no	n/a	n/a	n/a
Syncerus caffer	Buffalo	skin pieces (cape	NE W	1 no	n/a	n/a	n/a
Syncerus caffer	Buffalo	skulls	NE W	1 no	n/a	n/a	n/a
Taurotragus oryx	Eland	backskin	NE W	1 no	n/a	n/a	n/a
Taurotragus oryx	Eland	skin pieces (cape	NE W	1 no	n/a	n/a	n/a
Taurotragus oryx	Eland	skulls	NE W	1 no	n/a	n/a	n/a

12. Country of origin	Permit No	Date of issue	12a. Country of last re-export	Certificate No	Date

13. This permit is issued by

Place: Bulawayo Date: 25-07-2018

Security stamp, signature and official seal:

ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
21 AUG 2018
WESTERN REGION
P.O. BOX 2283 BULAWAYO
TEL.: 09 - 74000 FAX: 09 883386

14. Exchange Control Information
CD1 number ..... /or
CD1 not applicable to export (delete)

(Date stamp and signature of authorised official): .....
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity

17. Bill of lading/Air waybill number:

Port of export Date Signature

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

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

0000080362
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	PASSING CLOUD SAFARIS T/A PRO SAFARIS AFRICA	Client's Full Name	Scott Ross Somers
ZTA (HOP) No.	HOP0012	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	20 HADDON AVENUE KHUMALO BULAWAYO	Address	(b) (6) Davison MI48423 USA
Name of Professional Hunter	JOHN GREEFF	Licence No.	127
Telephone		Fax	N/A
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	OUTBOUND CARGO & TROPHY CONSULTANTS	Address	5 GRANTHAM ROAD ,BELMONT ,BULAWAYO
Name of Shipping Agent		Address	
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Chishakwe	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	05-06-2018
Date of Safari To	19-06-2018
Daily Rate Charged For Big Game USD	150.00
Daily Rate Charged For Plains Game USD	150.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	1,500.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	12,000.00
Other fees (incidentals)	7,995.00	Grand Total USD	21,495.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Chishakwe	S2016839	09-JUN-2018		5,500
2	GIRAFFE	M	Killed	Chishakwe	S2016990	07-JUN-2018		900
3	ELAND	M	Killed	Chishakwe	S2016280	11-JUN-2018		1,000
4	BUFFALO	M	Killed	Chishakwe	S2014922	11-JUN-2018		3,000
5	ZEBRA	M	Killed	Chishakwe	S2015391	06-JUN-2018		800
6	ZEBRA	M	Killed	Chishakwe	S2015862	07-JUN-2018		800
7								
8								
9								
10								
11								
12								
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30								

ALSO QUESTION 9

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

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

AUTHORISED
0000080362
SUBMITTED
29/05/2018

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	PASSING CLOUD SAFARIS T/A PRO SAFARIS AFRICA	Client's Full Name	Scott Ross Somers
ZTA (HOP) No.	HOP0012	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	20 HADDON AVENUE KHUMALO BULAWAYO	Address	(b) (6) USA
Name of Professional Hunter	JOHN GREEFF	Licence No.	127
Telephone		Fax	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist		Address	
Name of Shipping Agent		Address	
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Chishakwe	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	05-06-2018
Date of Safari To	19-06-2018
Daily Rate Charged For Big Game USD	150.00
Daily Rate Charged For Plains Game USD	150.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	Total Guests rate
Less Commission	Total Trophy fees
Other fees (incidentals)	Grand Total USD
Percentage Commission Charged	Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	IMPALA	M	K	CHISHAKWE		6/6/2018	BAIT	
2	ZEBRA	M	K	"		6/6/2018	-	
3	ZEBRA	M	K	"		8/6/2018	-	
4	GIRAFFE	M	K	"		7/6/2018	-	
5	LION	M	K	"		9/6/2018	1"	
6	BUFFALO	M	K	CHISHAKWE		11/6/2018	100"	
7	ELAND	M	K	CHISHAKWE		11/6/2018	90"	
8								
9								
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11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

Foreign Client

Signature of Professional Hunter

Signature of Safari Operator

Invoice Amount

Scott Sanders

information given in this return is, to the best of my knowledge, true and correct.

(b) (6) [redacted]

Foreign Client _____ Date 6/14/2018

Name of Professional Hunter JSA Date 14/6/2018

Signature of Safari Operator _____ Date _____

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 21 May 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Passing Cloud Safaris who have applied for permit to hunt 1 x lion with client Scott Ross Sommers in the following property:

- Chishakwe in Save Valley Conservancy Masvingo Province **from 5 June 2018 to 19 June 2018.**

The hunt will be under the guidance of professional hunter John Greeff PH license #127.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~..... 21/05/18.

Investigation and Security Manager **Date**

Approved/ ~~Not Approved~~: 21/05/18

Herd Management Services **Date**

Parks and Wildlife Management Authority
MANAGEMENT SERVICES CONSUMPTIVE
23 MAY 2018
HEAD OFFICE
P. O. BOX CY 140 CAUSEWAY HARARE
TEL: (04) 707 [illegible]

Property of National Parks. Box CY 140
Parks and Wildlife Management Authority
ISSUED IN TERMS OF CHAPTER 20:14 TO:
MANAGEMENT SERVICES CONSULTANTS
JOHN GREEFF NO: 127
VALID UNTIL 31 DECEMBER 2018
MAR
AUTHORISING OFFICER
HEAD OFFICE
CAUSEWAY. HARARE
P. O. BOX CY
TEL: (04)

JOHN GREEFF

Professional Hunter

Licence No: 127 Y.O.I. 1999

I.D No:- (b) (6)

Drivers Licence No:- 91030 F

Class:- 4,5

Other Licences:- Professional Guide

AUTHORIZED TO CARRY FIREARMS

The Savé Valley Conservancy Lion Management Plan, 2011

Dr PJ Funston
Department of Nature Conservation
Tshwane University of Technology
Private Bag X680
Pretoria, 0002
South Africa
funstonpj@tut.ac.za
+27-12-83-7040215

Executive summary

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Hunting older females from key prides

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

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

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

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

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

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

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

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

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

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

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

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1. Introduction

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

In 2002 the Zimbabwe lion population was estimated to be between 1,000-1,700 animals (Chardonnet 2002, Bauer and Van der Merwe 2004,) with an estimated range of c. 90,000 km^2. However, to date information on population status, current distribution and trends still remain lacking for most major wildlife areas in Zimbabwe, although there are estimates of numbers for some areas. Lion specific surveys and research have largely been limited to national parks and wildlife estates, notably Hwange National Park, the Matetsi Safari Area in northwest Matabeleland, and Mana and Matusadona National Parks in the Zambezi Valley (Monks 2005). In the south-east lowveld lions have been monitored in different areas using a combination of track frequency counts, call-in surveys, and direct monitoring. Track surveys have been conducted in Savé Valley Conservancy from 2007-2010 (Groom 2008-2010). Call-in surveys have been conducted in Gonarezhou National Park (Groom & Funston 2010, Groom & Funston in prep) and sporadically in Savé Valley Conservancy from 1996 to 2007 (Pole 1999; Pole 2003), and lions have been directly monitored in Malilangwe.

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

1.1 Savé Valley Conservancy

During the 1980s and 1990s game ranching developed as a major land use in the south-east Lowveld of Zimbabwe. In several areas, ranchers cooperated to form large collaboratively-managed wildlife areas, or conservancies. The most notable example of this was the 3,450 km^2 Savé Valley Conservancy, created in 1991 from 18 former cattle ranches (Figure 1). The natural land cover is deciduous woodland savanna dominated by *Colophospermum mopane,* Acacia-Combretum woodland and *Acacia tortillis* woodland (Pole 2004). Following a bad drought in 1991/1992, most of the conservancy's cattle were removed and the focus shifted

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

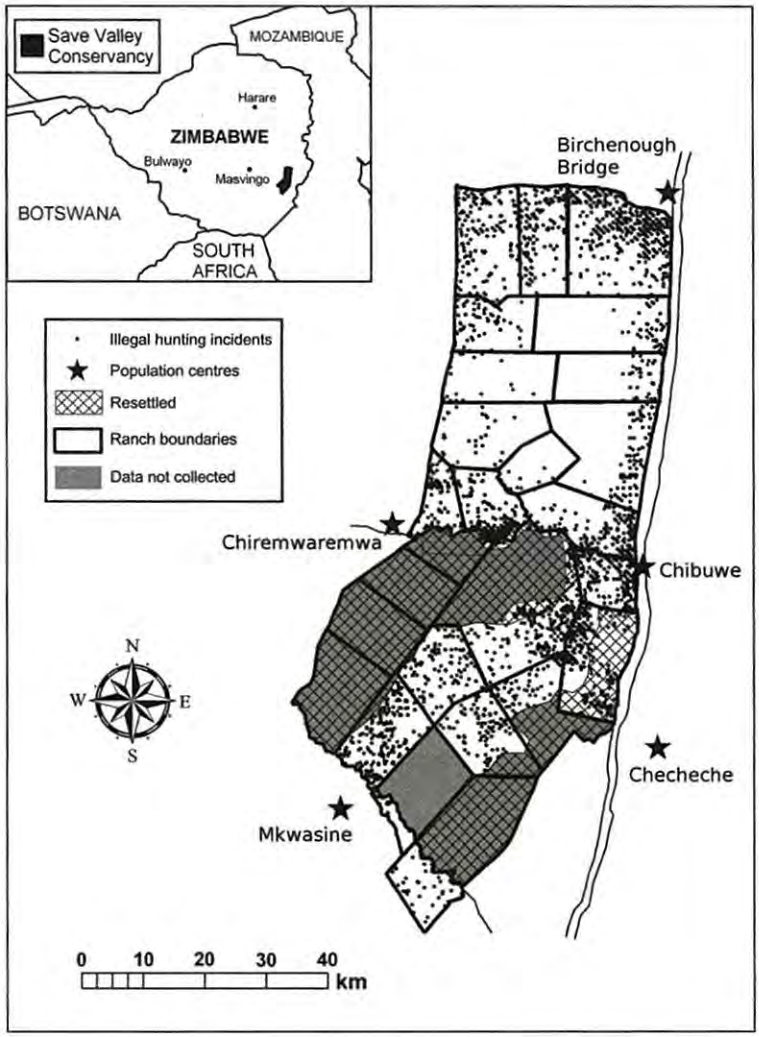

Figure 1. Map of the Savé Valley Conservancy highlighting settled land and the distribution of illegal hunting incidences from 2005 to 2009 (from Lindsey *et al.* 2010)

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

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

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

1.2 Lion Population Recovery in the Savé Valley Conservancy

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

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

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

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

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

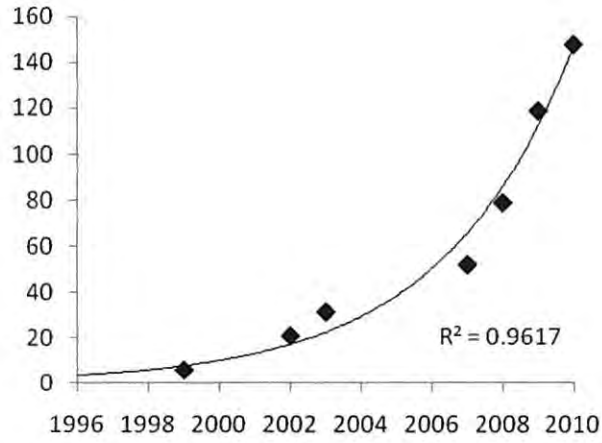

Figure 2. Rate of increase of lions in the Savé Valley Conservancy from 1996 to 2010 as determined by call-in and track index surveys. Average growth rate is $35\%^{-year}$

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

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

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

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

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

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

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

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

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

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

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

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

To date the main aim of hunting lions in the Savé Valley Conservancy has been to raise revenue. From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year^{-1}), yielding gross income of US$912,900 (US$182,580 year^{-1}). Currently the conservancy has a lion population of similar density (160 lions = 6.9 lions/100 km^2) to similarly vegetated areas in northern Kruger National Park with medium prey density (Ferreira & Funston 2010). However, projections based on prey biomass suggest further increase can be expected. Being surrounded by communal settlement areas the conservancy is a net source for lions in

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

3. The Potential of Safari Hunting to Impact Lion Populations

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

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

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

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

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

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

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

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

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

4. Lion Survey Techniques to Determine Quotas

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

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

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

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

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

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

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

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

5. Population Dynamics and Regulating Lion Population Growth

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

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

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

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

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

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

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

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

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

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

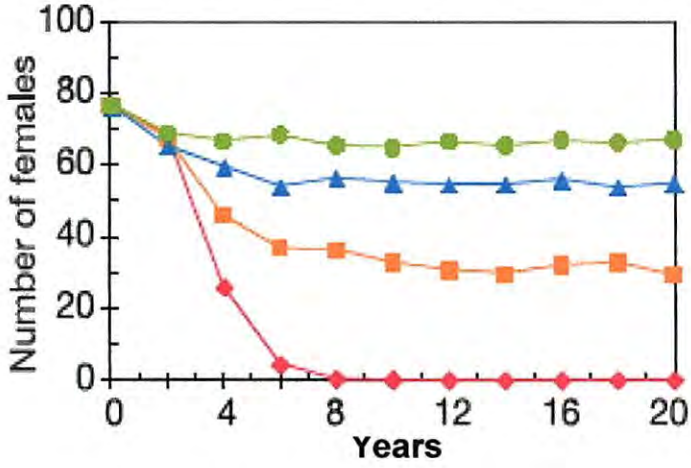

Figure 3. The effects of trophy hunting on the number of adult females after 20 years, as a function of quota size and male age. Average outcome after 100 runs is shown from shooting males of the following ages: ≥3 yr old (red), ≥4 yr (orange), ≥5 yr (blue), ≥6 yr (green)(from Whitman *et al.* 2004).

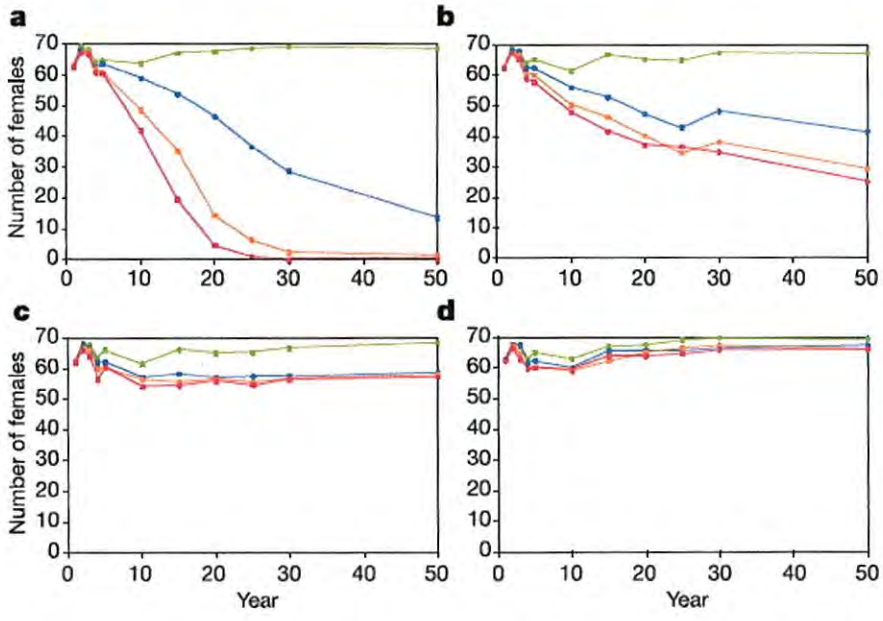

Figure 4. The effect of quota size and male age on female population size through time as a function the age at which males are hunted. Red indicates average outcome over 100 runs from annual quota of 10 males, orange from quota of 6 males, blue from quota of 4, and green from quota of 2. a–d, Female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

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

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

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

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

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

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

5.4 Hunting older females from key prides to stabilize population growth

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

6. Offtake Strategies and Final Recommendations

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

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

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

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

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

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

7.1 Mitigating (preventing) livestock depredation

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

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

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

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

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

7.2 Response to livestock depredation events

7.2.1 Settled and Neighbouring communities

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

7.2.2 Landowners with title deeds and conservator

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

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

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

7.2.3 Stock raider classification

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

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

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

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

7.2.4 Record keeping of incidents and co-operation

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

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Firstly and very importantly I would like to thank the landowners and managers of the Savé Valley Conservancy for the enriching opportunity to work towards and adaptive management plan for lions the conservancy. There are few areas in Africa where lions are increasing in numbers even when being hunted, with this work thus giving me a unique opportunity.

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9 References

Anderson, J.L. 1981. The re-establishment and management of a lion population in Zululand, South Africa. *Biological Conservation* **19**:107- 117.

Baskin, Y. 1994. There's a new wildlife policy in Kenya: Use it or lose it. *Science* **265**: 733-734.

Child, G. & Child, B. 1990. An historical perspective of sustainable wildlife utilization. Paper prepared for Workshop No. 7, 18th IUCN General Assembly, Perth.

Creel, S. & Creel .M. 1997. Lion density and population structure in the Selous Game Reserve: evaluation of hunting quotas and offtake. *Afr. J. Ecol.* **35:** 83-93.

Funston, P.J., Mills, M.G.L., Biggs, H.C. and Richardson, P.R.K. 1998. Hunting by male lions: Ecological influences and socio-ecological implications. *Anim. Behav.* **56**: 1333-1345.

Funston, P.J. 1999. Predator-prey relationships between lions and large ungulates in the Kruger National Park. PhD thesis, University of Pretoria.

Funston, P.J., Mills, M.G.L. & Biggs, H.C. 2001. Factors affecting the hunting success of male and female lions in the Kruger National Park. *J. Zool., Lond.* **253:** 419-431.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Kruiper, H., Jaggers, H. & Masule, K. 2001. Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. *In prep.*

Funston, P.J. 2001. Kalahari Transfrontier Lions Project: Final Report.

Funston, P.J., Mills, M.G.L., Richardson, P.R.K. & van Jaarsveld, A.S. 2003. Reduced dispersal and opportunistic territory acquisition in male lions (Panthera leo). *J. Zool., Lond.* **259:** 1-12.

Funston, P.J. & Janse van Rensburg, D. 2003. Venetia-Limpopo Lion Project: Lion Survey March 2003. Submitted to De Beers Ecological Division.

Funston, P.J. 2004. Potential and problems of game ranching with large carnivores in South Africa, 2004. In: *Proceedings of a Symposium on Game Ranch Planning*. Wildlife Group of the South African Veterinary Association, Onderstepoort, South Africa. pp 49-63.

Grant, C.C., Davidson, T, Funston, P.J. & Pienaar, D.J. 2002. Challenges faced in the conservation of rare antelope: a case study on the northern basalt plains of the Kruger National Park. *Koedoe* **45:** 45-66.

Greene, C.M, Umbanhowar, J.A., Mangel, M., & Caro, T. 1998. Animal breeding systems, hunter selectivity, and consumptive use in wildlife conservation. In : *Behavioral Ecology and Conservation Biology* (Ed.) T.M. Caro, Oxford University Press, Oxford, pp. 272-305.

Groom, R.J. 2008. Carnivore densities in the Savé Valley Conservancy; Results of the 2008 spoor survey. *Report for Savé Valley Conservancy Technical Advisory Committee.*

Groom, R.J. 2009. Carnivore densities in the Savé Valley Conservancy; Results of the 2009 spoor survey. *Report for Savé Valley Conservancy Technical Advisory Committee.*

Groom, R.J. 2010. Carnivore densities in the Savé Valley Conservancy; Results of the 2009 spoor survey. *Report for Savé Valley Conservancy Technical Advisory Committee.*

Hoare, R.E., & Williamson, J. 2001. Assisted re-establishment of a resident pride of lions from a largely itinerant population. *S. Afr. J. Wildl. Res.* **31**: 179-182.

Hunter, L. 1999. The socio-ecology of re-introduced lions in small reserves: comparisons with established populations and the implications of management in enclosed conservation areas. *Unpublished report.*

Kelly, M. & Durant, S. 2000. Viability if the Serengeti cheetah population. *Conservation Biology* **14**: 786-797.

Kiss, A. 1990. Living with wildlife: wildlife resource management with local participation in Africa. Technical Paper No. 130. World Bank, Washington, CD.

Kock, R.A. 1995. Wildlife utilization: Use it or lose it - A Kenyan perspective. *Biodiversity and Conservation* **4:** 241-256.

Lavigne, D.M., Callaghan, C.J., & Smith, R.J. 1996. Sustainable utilization: the lessons of history. In: *The Exploitation of Mammal Populations*. (Eds.) V.J. Taylor & N. Dunstone, Chapman & Hall, London, pp. 250-265.

Lindsey, P.A., Alexander, R., du Toit, J.T., & Mills, M.G.L. 2005. The cost efficiency of wild dog conservation in South Africa. *Conservation Biology*, **19**: 1205-1214.

Lindsey, P.A., Alexander, R.R., du Toit, J.T., & Mills, M.G.L. 2005b. The potential contribution of ecotourism to African wild dog Lycaon pictus conservation in South Africa. *Biological Conservation*, **123:** 339-348.

Lindsey, P.A., du Toit, J.T., & Mills, M.G.L. 2004. The distribution and population status of African wild dogs (*Lycaon pictus*) outside protected areas in South Africa. *South African Journal of Wildlife Research*, **34:** 143-151.

Lindsey, P.A., du Toit, R.T., Pole, A., & Romanach, S. 2008. Save Valley Conservancy: a large scale African experiment in co-operative wildlife management. In *Evolution and innovation in wildlife conservation in southern Africa* (eds B. Child, H. Suich & A. Spenceley), pp. 163-184. Earthscan, London.

Lindsey, P.A., Alexander, R., Frank, L.G., Mathieson, A & Romanach, S.S. 2008. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based landuses may not be viable.

Lindsey, P.A., Romanach, S., Tambling, C., Chartier, K., & Groom, R.J. 2011. Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. *Oryx* **45:** 96-111.

Loveridge, A.J., Searle, A.W., Murindagomo, F., & Macdonald, D.W. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. *Biological Conservation* **134:** 548-558

Martin R. & Thomas S. 1991. Quotas for sustainable wildlife utilisation in communal lands. Manual for District Councils with appropriate authority. The Zimbabwe Trust in association with the Department of National Parks and Wildlife Management, Harare, Zimbabwe.

Mills, M.G.L. 1985. Hyaena survey of the Kruger National Park, August 1984. IUCN-SSC Hyaena Specialist Group Newsletter **2**: 15-25.

Mills, M.G. L. 1991. Conservation management of large carnivores in Africa. *Koedoe* **34**(1): 81-90.

Mills, M.G.L. & Shenk, T.M. 1992. Predator-prey relationships: the impact of lion predation on wildebeest and zebra populations. *J. Anim. Ecol.* **61**: 693-702.

Mills, M.G.L. & Gorman, M.I. 1997. Factors affecting the density and distribution of wild dogs in the Kruger National Park. *Conservation Biology* **11**: 1397-1406.

Mills, M.G.L., Juritz, J.M. & Zucchini, W. 2001. Estimating the size of spotted hyaena (Crocuta crocuta) populations, through playback recordings allowing for non-response. *Animal Conservation* **4:** 335- 343.

Mills, M.G.L. & Funston, P.J. 2003. Large carnivores and savanna heterogeneity. In: *The Kruger Experience: Ecology and Management of Savanna Heterogeneity.* (eds.) du Toit, J.T., Biggs, H. and Rogers, R. Island Press, Washington, DC, USA. Pp 370-388.

Norton-Griffiths, M. 1978. *Counting Animals*, 2nd edn. Serengeti Ecological Monitoring Programme. African Wildlife Foundation, Nairobi.

Ogutu, J.O. & Dublin, H.T. 1998. The response of lions and spotted hyenas to sound playbacks as a technique for estimating population size. *Afr. J. Ecol.* **36:** 83-95.

Packer, C., Altizer, S., Appel, M., Brown, E., Martenson, J., O'Brien, S.J., Roelke-Parker, M., Hofmann-Lehmann, R., & Lutz, H. 1999. Viruses of the Serengeti: patterns of infection and mortality in African lions. *J. Anim. Ecol.* **68**: 1161-1178.

Schaller, G.B. 1972. *The Serengeti Lion: A study of predator-prey relations*. University of Chicago Press, Chicago.

Severrre, E.L.M. 1995. Setting quotas for tourist hunting in Tanzania. In: *Tourist Hunting in Tanzania.* (Eds.) Leader-Williams, N., Kayera, J.A., and Overton G.L. Tanzania Department of Wildlife, Dar es Salaam, pp. 52-53.

Smuts, G.L. 1976. Population characteristics and recent history of lions in two parts of the Kruger National Park. *Koedoe* **19:** 153-164.

Smuts, G.L., Whyte, I.J. & Dearlove, T.W. 1977. A mass capture technique for lions. *East African Wildlife Journal* **15:** 81-87.

Smuts, G.L. 1978. Interrelations between predators, prey, and their environment. *BioScience* **28:** 316-320.

Smuts, G.L. et al. 1978. Reproductive and social organisation of lions from the Kruger National Park. *Carnivore* **1:** 17-28.

Stalmans, M., Attwell, B. & Estes, L. 2003. Hunting in the Associated Private Nature Reserves: Environmental Impact Assessment Process, Final Scoping Report, February 2003.

Starfield, A.M., Shiell, J.D. & Smuts, G.L. 1981. Simulation of lion control strategies in a large game reserve. Ecological Modelling **13**: 17 – 28.

Van Dyk, G. 1997. Reintroduction techniques for lion. Proceedings of a *Symposium on Lions and Leopards as Game Ranch Animals*. Wildlife Group, South African Veterinary Association, Onderstepoort. Pages: 82-91.

Van Vuuren, J.H., Herrmann, E. & Funston, P.J. 2004. Lions in the Kgalagadi Transfrontier Park: Modelling the Effect of Human-caused Mortality. *International Transactions in Operational Research*. **123:** 23-40.

Venter J. & Hopkins M.E. 1988. Use of a simulation model in the management of a lion population. *S. Afr. J. Wildl. Res.* **18**: 126-130.

Wilkie, D.S., & Carpenter, J.F. 1999a. Can nature tourism help finance protected areas in the Congo Basin? *Oryx* **33**: 332-338.

Wilkie, D.S., & Carpenter, J.F. 1999b. The potential role of safari hunting as a source of revenue for protected areas in the Congo Basin. *Oryx* **33**: 339-345.

Winterbach, C.H., Winterbach, H., Rutina, L., & Kat, P.W. 1999. Results of the coordinated dry season lion survey for the Okavango Delta 1998. Unpublished report. Department of Wildlife and National Parks, Botswana.

Whitman, K. & Packer, C. 1997. The effect of sport hunting on the social organisation of the African lion (*Panthera leo*). *Proceedings of a Symposium on Lions and Leopards as Game Ranch Animals,* Onderstepoort, 177-183.

Woodroffe, R.A., & Ginsberg, J.R. 1998. Edge effects and the extinction of populations inside protected areas. *Science* **280**: 2126-2128.

Yamazaki, K. 1996. Social variation of lions in a male depopulated area in Zambia. *J. Wildl. Manag.* **60**: 490-497.

Appendix 1: Savé Valley Conservancy Lion Population Survey 2011

Introduction

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

Methods

The survey method used was baited call-up stations as described by Smuts, Whyte & Dearlove (1977), with a modification to the method in the use of camera traps to photograph shy or elusive lions. We used a density of 13 call-up stations per 1,000 km^2, to ensure that we sampled an area of 1886 km^2 assuming a response radius of 5 km (Smuts et al. 1977). A total of 25 stations were surveyed (Figure 5). We attempted to space all stations about 10 km apart from each other, but various logistic constraints precluded an ideal distribution of calling sites in some areas. Notably we would like to survey one or two additional sites on Sango. We were also not granted permission to survey the Msaize and Mapari ranches, and thus positioned calling stations close to their boundaries. For Savuli we had comprehensive camera trap records that further surveying was not necessary in that area. As the stations where placed on the conservancy in a series of concentric 5km radii we assumed this design would achieve as close as possible to a total count, realizing though that the response probability of the lions was not known.

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

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

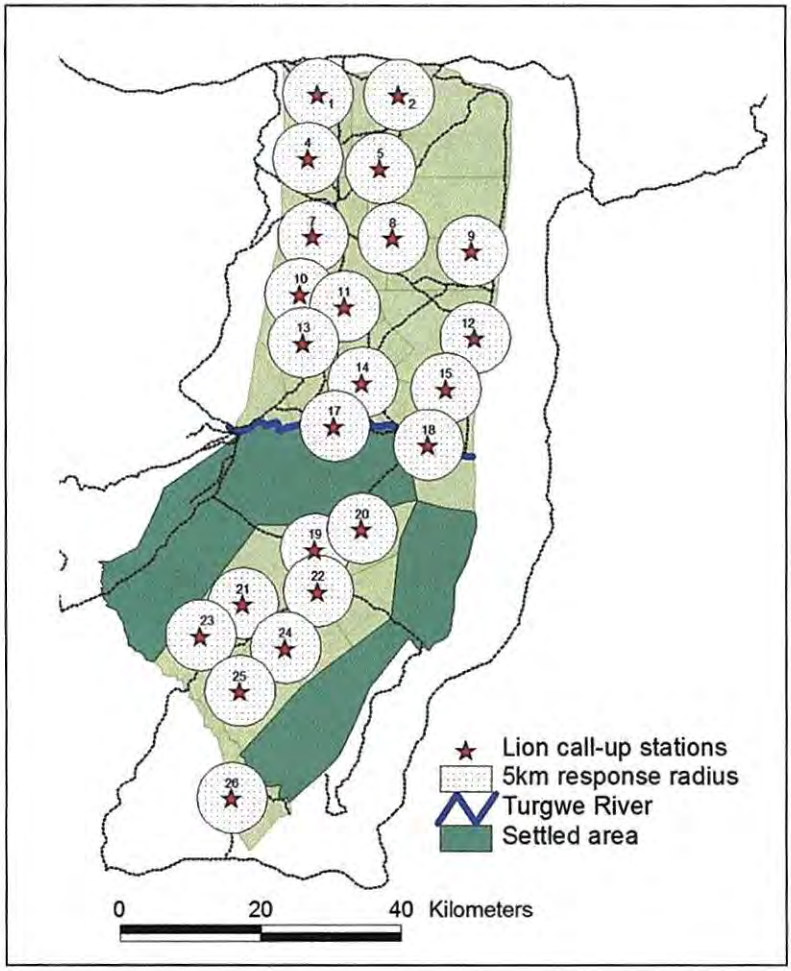

Figure 1. Map of the Savé Valley Conservancy indicating settled area and the planned position of calling stations for the 2011 lion survey

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

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

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

Results and Discussion

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

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

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

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

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

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

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

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

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

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

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

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

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

Recommendations

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

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

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

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

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

Appendix 2: Assessment of trophy hunted lion and leopard trophies

Guidelines for data collection

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

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

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

1. Hunt return forms

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

2. Measurements (included on the hunt return form)

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

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

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

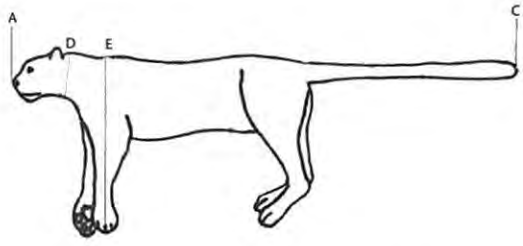

Figure 1: Body measurements to be taken for each trophy before skinning.

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

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

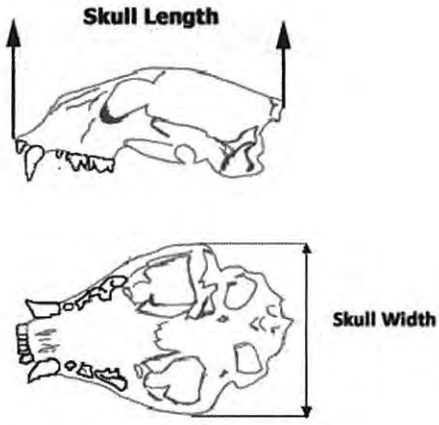

Figure 2: Skull measurements to be taken for each lion and leopard trophy.

3. Photographs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Removal of single rooted premolar (P^2) for x-ray assessment

Post mortem x-rays of teeth can assist with aging trophies - the pulp cavity fills in as lion and leopard get older. The best tooth to remove is the first upper premolar (P^2 below); it does not matter from which side of the skull. P^2 is small and will not affect the overall appearance of the trophy. The tooth can be removed from the skull using a pair of pliers although care must be taken not to crack it. The tooth can be placed in an envelope and sent with the hunt return form and photographs. It is essential the envelope is correctly labeled with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, the date the trophy was taken, and the name of the hunting block or property where the hunt was undertaken.

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

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

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

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

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

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

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

2. Blood samples for disease analysis:

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

3. Trail camera photographs:

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

HUNT PERMIT NUMBER		CLIENT NAME	
PROFESSIONAL HUNTER		HUNTING OUTFITTER	
HUNTING BLOCK		CONCESSION HOLDER	
HUNT START DATE		HUNT FINISH DATE	

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

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

Free ranging: _____ On baits: _____

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

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

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

IF TROPHY WAS TAKEN:

7. Date trophy taken: _____ 8. Time shot: _____

9. Location GPS (in decimal degrees): _____

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

MEASUREMENTS:

11. Skull length (mm): _____ 12. Skull width (mm): _____

13. Body length (cm): _____ 14. Shoulder height (cm): _____

15. Neck circumference (mm): _____

PHOTOGRAPHS (before skinning):

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

PHOTOGRAPHS (clean skull)

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

SAMPLES

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

Return form to:
Name:
Organisation:
Address:

Fax Number:
Email :

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

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Summary

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

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

Introduction

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

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

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

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

populations negatively through direct and indirect mechanisms (Caro 1994; Laurenson 1994; Laurenson, Wielebnowski & Caro 1995; Creel & Creel 1996; Durant 2000; Creel, Mills & McNutt 2004). As a model for other areas we examined the Savé Valley Conservancy (SVC), a 3,440 km^2 privately owned ranch in Zimbabwe, where hunting provides the main source of income (Lindsey *et al.* 2011). We used spreadsheet models to evaluate the financial implications of large carnivores in private wildlife areas, and discuss the need for management of lion populations for both economic and ecological sustainability.

Methods and methods

2.1. Study area

Savé Valley Conservancy (3,440km^2), located in a semi-arid area of southeast Zimbabwe, was formed in 1991 by amalgamating 20 cattle ranches, into which 14 species of wildlife reintroduced, and land use shifted to high quality ecotourism and trophy hunting (Lindsey *et al.* 2008). These land use objectives were pursued successfully until a third of the conservancy was annexed in 2001 during Zimbabwe's land 'reform' program (Lindsey *et al.* 2008). Photo-tourism is now almost non-existent and there are high levels of poaching (Lindsey *et al.* 2011).

Large carnivores were all but extirpated by the cattle ranchers (du Toit 1994; Pole 1999). However, in SVC all have increased through natural recolonization, or augmentation, with lion and spotted hyenas populations showing the longest lag effect. Wild dogs, however, increased rapidly following recolonization of the area in 1992 (Pole 1999), due to their high fecundity, the absence of lions, and abundant prey. They peaked at 3.9 wild dogs/100 km^2 in 2004, the highest density on record (Pole 2006; Lindsey *et al.* 2008). Cheetah populations also increased rapidly, but for unexplained reasons declined 2005. Leopard densities seem to have remained relatively high throughout (C.J. Joubert, *pers. comm.*).

2.2. Population estimates

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

2.4. Model development

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

2.4.1. Prey preferences of large carnivores

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

2.4.2. Predation rates

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

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

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

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

2.4.3. Determining ungulate population trends

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

2.4.3. Economic calculations

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

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

Results

3.1. Population estimates

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

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

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

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

3.2. Large carnivore utilization

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

3.3. Model results

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

3.3.4. Economic calculations

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

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

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

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

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

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

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

	2005	2006	2007	2008	2009

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

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

4. Discussion

4.1 Ungulate populations

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

4.2. Large carnivore populations

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

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

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

4.3 Economic implications

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

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

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

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

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

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

4.4 Management implications

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

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

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

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References

Archabald, K. & Naughton-Treves, L. (2001) Tourism revenue-sharing around national parks in Western Uganda: early efforts to identify and reward local communities. *Environmental Conservation*, **28**, 135-149.

Bailey, T.N. (1993) *The African leopard: ecology and behavior of a solitary felid* Columbia University Press, New York.

Barnes, J.I. (2001) Economic returns and allocation of resources in the wildlife sector of Botswana. *South African Journal of Wildlife Research*, **31**, 141-153.

Bonesi, L. & Macdonald, D.W. (2004) Impact of released Eurasian otters on a population of American mink: a test using an experimental approach. *Oikos*, **106**, 9-18.

Booth, V. (2004) Zambezi Valley hunting camps: summary of auction prices. *African Hunter*, **10**, 31-32.

Booth, V.R. (2009). A Comparison of the Prices of Hunting Tourism in Southern and Eastern Africa. Joint publication of FAO and CIC, Budapest.

Bothma, J.d.P., Peel, M.S.J., Petit, S., & Grossman, D. (1990) Evaluating the accuracy of some commonly used game-counting methods. *South African Journal of Wildlife Research*, **20**, 26-32.

Bothma, J.d.P., van Rooyen, N., & du Toit, J.T. (2010). Antelope and other small herbivores. In *Game Ranch Management - Fifth Edition* (eds J.d.P. Bothma & J.T. du Toit), pp. 210-245. Van Schaik, Pretoria.

Caro, T.M. (1994) *Cheetahs of the Serengeti Plains: group living in an asocial species.* University of Chicago Press, Chicago.

Caro, T.M., Young, C.R., Cauldwell, A.E., & Brown, D.D.E. (2009) Animal breeding systems and big game hunting: Models and application. *Biological Conservation*, **142**, 909-929.

Child, B. (1996) The practice and principles of community-based wildlife management in Zimbabwe: the CAMPFIRE programme. *Biodiversity and Conservation*, **5**, 369-398.

Creel, S. & Creel, N.M. (1996) Limitation of African Wild Dogs by Competition with Larger Carnivores. *Conservation Biology*, **10**, 526-538.

Creel, S. & Creel, N.M. (1997) Lion density and population structure in the Selous Game Reserve: evaluation of hunting quotas and offtake. *African Journal of Ecology*, **35**, 83-93.

Creel, S. & Creel, N.M. (2002) *The African Wild Dog. Behavior, Ecology and Conservation* Princeton University Press, Princeton & Oxford.

Creel, S., Mills, M.G.L., & McNutt, J.W. (2004). African wild dogs: demography and population dynamics of African wild dogs in three critical populations. In *The biology and conservation of wild canids.* (eds D.W. Macdonald & C. Sillero-Zubiri), pp. 337-350. Oxford University Press, Oxford.

Crooks, K.R. & Soulé, M.E. (1999) Mesopredator release and avifaunal extinctions in a fragmented system. *Nature*, **400**.

du Toit, R.F. (1994). The Save Valley Conservancy. In *The Lowveld Conservancies: New opportunities for productive and sustainable land use*, pp. 28-36. Price Waterhouse Wildlife, Tourism and Environmental Consulting, Zimbabwe.

Durant, S.M. (2000) Living with the enemy: avoidance of of hyenas and lions by cheetahs in the Serengeti. *Behavioural Ecology*, **11**, 624-632.

Frame, G. (1999). Cheetah. In *The encyclopedia of mammals* (ed D.W. Macdonald), pp. 58-62. Andromeda Oxford Limited, Oxford.

Fryxell, J.M., Greever, J., & Sinclair, A.R.E. (1988) Why are migratory ungulates so abundant? *The American Naturalist*, **131**, 781-798.

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, **281**, 56-65.

Funston, P.J. & Mills, M.G. (2006) The influence of lion predation on the population dynamics of common large ungulates in the Kruger National Park. *South African Journal of Wildlife Research*, **36**, 9-22.

Funston, P.J., Mills, M.G.L., & Biggs, H.C. (2001) Factors affecting hunting success of male and female lions in the Kruger National Park. *Journal of Zoology*, **253**, 419-431.

Funston, P.J., Mills, M.G.L., Biggs, H.C., & Richardson, P.R.K. (1998) Hunting by male lions: ecological influences and socioecological implications. *Animal Behaviour*, **56**, 1333-1345.

Gordon, I.J., Hester, A.J., & Festa-Bianchet, M. (2004) The management of wild large herbivores to meet economic, conservation and environmental objectives. *Journal of Applied Ecology*, **41**, 1021-1031.

Grange, S. & Duncan, P. (2006) Bottom-up and top-down processes in African ungulate communities: resources and predation acting on the relative abundance of zebra and grazing bovids. *Ecography*, **29**, 899-907.

Grange, S., Duncan, P., Gaillard, J.M., Sinclair, A.R.E., Gogan, P.J.P., Packer, C., Hofer, H., & East, M. (2004) What limits the Serengeti zebra population? *Oecologia*, **140**, 523-532.

Grobbelaar, C. & Masulani, R. (2003). Review of offtake quotas, trophy quality and 'catch-effort' across the four main wildlife species elephant, buffalo, lion and leopard., Harare, Zimbabwe.

Gros, P.M. (2002) The status and conservation of the cheetah *Acinonyx jubatus* in Tanzania. *Biological Conservation*, **106**.

Hayward, M.W., Henschel, P., O'Brien, J., Hofmeyr, M., Balme, G., & Kerley, G.I.H. (2006a) Prey preferences of the leopard (*Panthera pardus*). *Journal of Zoology*, **270**, 298-313.

Hayward, M.W., Hofmeyr, M., O'Brien, J., & Kerley, G.I.H. (2006b) Prey preferences of the cheetah (*Acinonyx jubatus*) (Felidae: Carnivora): morphological limitations or the need to capture rapidly consumable prey before kleptoparasites arrive? *Journal of Zoology*, **270**, 615-627.

Hayward, M.W. & Kerley, G.I.H. (2005) Prey preferences of the lion (*Panthera leo*). *Journal of the Zoological Society of London*, **267**, 309-322.

Hayward, M.W. & Kerley, G.I.H. (2008) Prey preferences and dietary overlap amongst Africa's large predators. *South African Journal of Wildlife Research*, **38**, 93-108.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, **139**, 219-229.

Henschel, J.R. & Skinner, J.D. (1990) The diet of spotted hyaenas *Crocuta crocuta* in Kruger National Park. *African Journal of Ecology*, **28**, 69-82.

Henschel, J.R. & Tilson, R.L. (1988) How much does a spotted hyaena eat? Perspective from the Namib desert. *African Journal of Ecology*, **26**, 247-255.

Joubert, C.J. & Joubert, L. (2010). Aerial suvery of the larger herbivores, Savé Valley Conservancy, Zimbabwe. Report complied for the Technical Advisory Committee of the Savé Valley Conservancy.

Kissui, B.M. (2008) Livestock predation by lions, leopards, spotted hyenas, and their vulnerability to retaliatory killing in the Maasai steppe, Tanzania. *Animal Conservation*, **11**, 422-432.

Kitchen, A.M., Gese, E.M., & Schauster, E.R. (1999) Resource partitioning between coyotes and swift foxes: space, time, and diet. *Canadian Journal of Zoology*, **77**, 1645-1656.

Krüger, O. (2005) The role of ecotourism in conservation: panacea or Pandora's box? *Biodiversity and Conservation*, **14**.

Langholz, J.A., Lassoie, J.P., Lee, D., & Chapman, D. (2000) Economic considerations of privately owned parks. *Ecological Economics*, **33**, 173-183.

Laurenson, M.K. (1994) High juvenile mortality in cheetahs (*Acinonyx jubatus*) and its consequence for maternal care. *Journal of Zoology*, **234**, 387-408.

Laurenson, M.K., Wielebnowski, N., & Caro, T.M. (1995) Extrinsic factors and juvenile mortality in cheetahs. *Conservation Biology*, **9**, 1329-1331.

Lindsey, P.A., Alexander, R., du Toit, J.T., & Mills, M.G.L. (2005a) The cost efficiency of wild dog conservation in South Africa. *Conservation Biology*, **19**, 1205-1214.

Lindsey, P.A., Alexander, R.R., du Toit, J.T., & Mills, M.G.L. (2005b) The potential contribution of ecotourism to African wild dog Lycaon pictus conservation in South Africa. *Biological Conservation*, **123**, 339-348.

Lindsey, P.A., du Toit, J.T., & Mills, M.G.L. (2004) The distribution and population status of African wild dogs (*Lycaon pictus*) outside protected areas in South Africa. *South African Journal of Wildlife Research*, **34**, 143-151.

Lindsey, P.A., du Toit, R.T., Pole, A., & Romanach, S. (2008). Save Valley Conservancy: a large scale African experiment in co-operative wildlife management. In *Evolution and innovation in wildlife conservation in southern Africa* (eds B. Child, H. Suich & A. Spenceley), pp. 163-184. Earthscan, London.

Lindsey, P.A., Romanach, S., Tambling, C., Chartier, K., & Groom, R.J. (2011) Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. *Oryx*, **45**, 96-111.

Linnell, J.D.C. & Strand, O. (2000) Interference interactions, co-existence and conservation of mammalian carnivores. *Diversity and Distributions*, **6**, 169-176.

Loveridge, A.J., Searle, A.W., Murindagomo, F., & Macdonald, D.W. (2007) The impact of sport-hunting on the population dynamics of an African lion population in a protected area. *Biological Conservation*, **134**, 548-558.

Maclennan, S.D., Groom, R.J., Macdonald, D.W., & Frank, L.G. (2009) Evaluation of a compensation scheme to bring about pastoralist tolerance of lions. *Biological Conservation*, **142**, 2419-2427.

Marker, L.L., Dickman, A.J., Mills, M.G.L., & Macdonald, D.W. (2003) Aspects of the management of cheetahs, Acinonyx jubatus jubatus,trapped on Namibian farmlands. *Biological Conservation*, **114**, 401-412.

Martin, R.B. (2008). Review of safari hunting in Botswana: Financial and economic assessment - draft report. Consultancy for The Botswana Wildlife Management Assoication.

Mbizah, M.M. (2009) *Diet choice of African wild dog (Lycaon pictus) and competition with other large carnivores in Savé Valley Conservancy, south east lowveld, Zimbabwe*. Master of Science, University of Zimbabwe, Harare.

Mills, M.G.L., Biggs, H.C., & Whyte, I.J. (1995) The relationship between rainfall, lion predation and population trends in African herbivores. *Wildlife Research*, **22**, 75-88.

Mills, M.G.L. & Gorman, M.L. (1997) Factors affecting the density and distribution of African wild dogs in the Kruger National Park. *Conservation Biology*, **11**, 1397-1406.

Mills, M.G.L. & Shenk, T.M. (1992) Predator-prey relationships: The impact of lion predation on wildebeest and zebra populations. *Journal of Animal Ecology*, **61**, 693-702.

Ogada, M.O., Woodroffe, R., Oguge, N.O., & Frank, L.G. (2003) Limiting depredation by African carnivores: the role of livestock husbandry. *Conservation Biology*, **17**, 1521-1530.

Owen-Smith, N. & Mills, M.G.L. (2008a) Predator-prey size relationships in an African large-mammal food web. *Journal of Animal Ecology*, **77**, 173-183.

Owen-Smith, N. & Mills, M.G.L. (2008b) Shifting prey selection generates contrasting herbivore dynamics within a large-mammal predator-prey web. *Ecology*, **89**, 1120-1133.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., & Caro, T.M. (2011) Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology*, **25**, 142-153.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., & Nowell, K. (2009) Sport hunting, predator control and conservation of large carnivores. *PLOS One*, **4**, e5941.

Peel, M.S.J. & Montagu, G.P. (1999) Modelling predator-prey interactions on a Northern Province game ranch. *South African Journal of Wildlife Research*, **29**, 31-34.

Pole, A. (2003). Hyena Survey of the Savé Valley Conservancy, November 2003. Unpublished report for Savé Valley Conservancy.

Pole, A. (2006). Management Plan for the Save Valley Conservancy. Unpublished report.

Pole, A., Gordon, I.J., Gorman, M.L., & MacAskill, M. (2004) Prey selection by African wild dogs (*Lycaon pictus*) in southern Zimbabwe. *Journal of Zoology*, **262**, 207-215.

Pole, A.J. (1999) *The behaviour and ecology of African wild dogs, Lycaon pictus, in an environment with reduced competitor density.* PhD, University of Aberdeen, Aberdeen.

Power, R.J. (2002) Prey selection of lions *Panthera leo* in a small, enclosed reserve. *Koedoe*, **45**, 67-75.

Radloff, F.G.T. & du Toit, J.T. (2004) Large predators and their prey in a southern African savanna: a predator's size determines its prey size range. *Journal of Animal Ecology*, **73**, 410-423.

Reid, D.G. (1999) *Ecotourism development in eastern and southern Africa* University of Guelph Press, Guelph, Canada.

Schaller, G.B. (1972) *The Serengeti Lion: A study of predator-prey relations* University of Chicago Press, Chicago.

Scheel, D. & Packer, C. (1991) Group hunting behaviour of lions: a search for cooperation. *Animal Behaviour*, **41**, 697-710.

Skinner, J.D. & Smithers, R.H.N. (1990) *The Mammals of the Southern African Subregion.* University of Pretoria, Pretoria.

Stander, P.E. (1998) Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, **35**, 378-385.

Thresher, P. (1981) The economics of a lion. *Unasylva*, **33**, 134.

Whitman, K., Quadling, H., Starfiled, A., & Packer, C. (2004) Sustainable trophy hunting in African lions. *Nature*, **428**, 175-178.

Wilkie, D.S. & Carpenter, J.F. (1999) Can nature tourism help finance protected areas in the Congo basin? *Oryx*, **33**.

Woodroffe, R., Davies-Mostert, H., Ginsberg, J., Graf, J., Leigh, K., McCreery, K., Mills, G., Pole, A., Rasmussen, G., Robbins, R., Somers, M., & Szykman, M. (2007) Rates and causes of mortality in Endangered African wild dogs Lycaon pictus: lessons for management and monitoring. *Oryz*, **41**, 215-223.

Woodroffe, R. & Frank, L. (2005) Lethal control of African lion (Panthera leo): local and regional population impacts. *Animal Conservation*, **8**, 91-98.

Woodroffe, R. & Ginsberg, J.R. (1999) Conserving the African wild dog *Lycaon pictus*. 1. Diagnosing and treating causes of decline. *Oryx*, **33**, 132-142.

Zambezi Hunters (2010). http://www.zambezihunters.com/ZH%20Save%20Valley%20Conservancy.html.

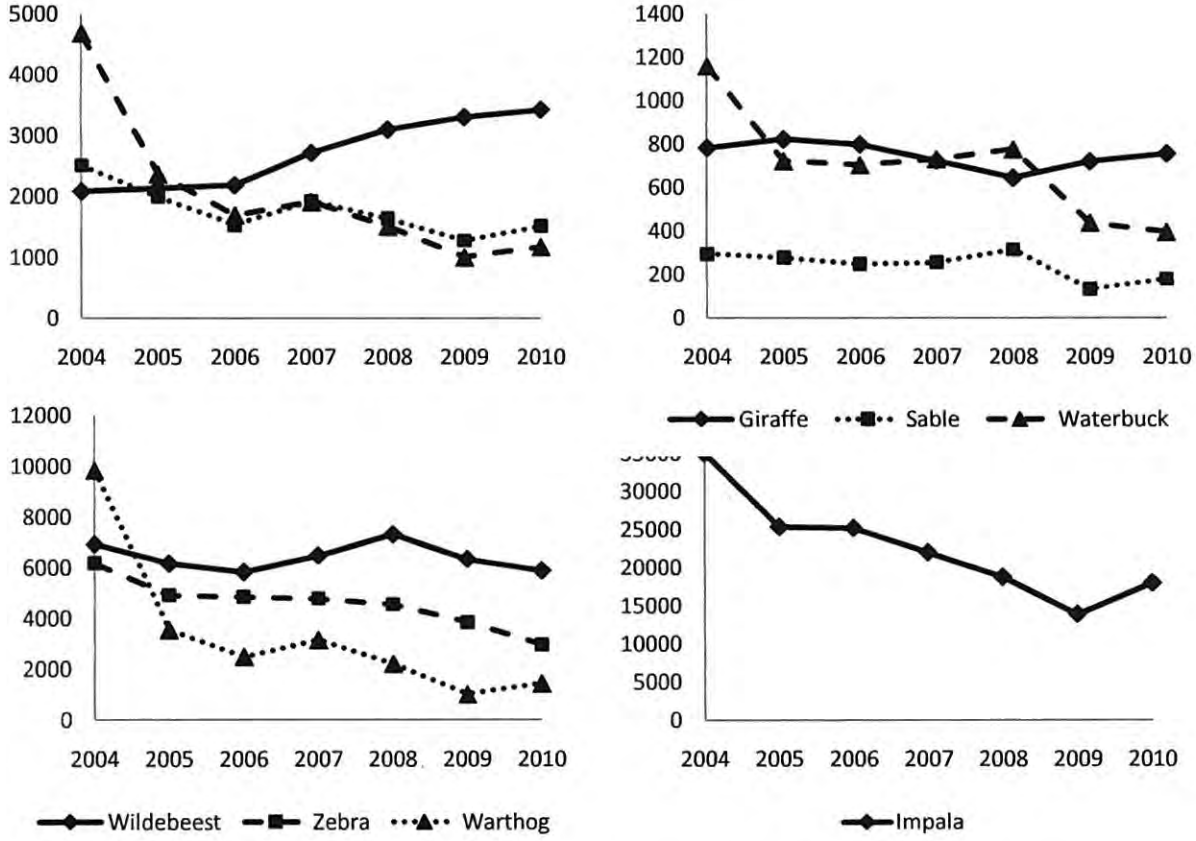


Figure 1. Population trends of ten key herbivore species in Savé Valley Conservancy from 2004 to 2010

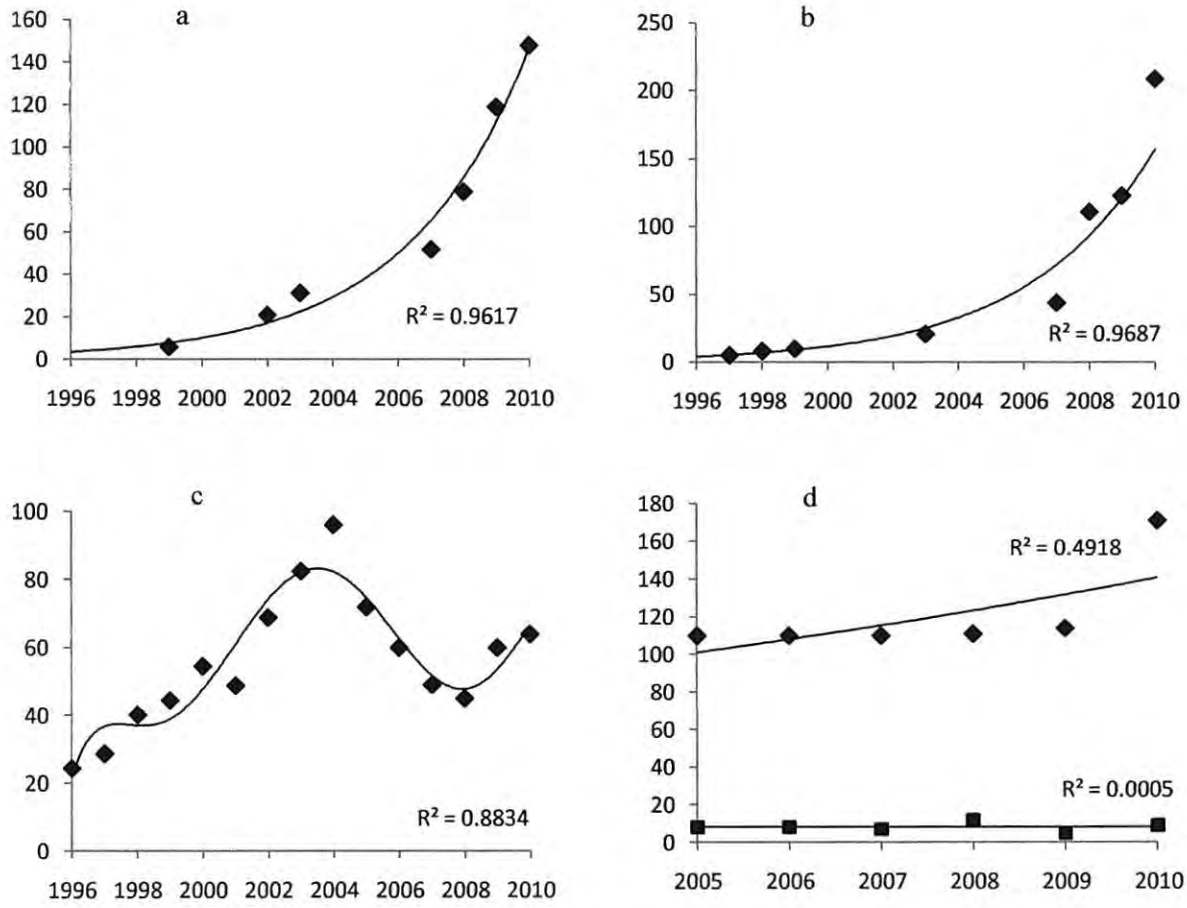


Figure 3. Population trends of a) lions, b) spotted hyenas, c) African wild dogs, and d) leopards (diamonds) and cheetahs (squares) in the Savé Valley Conservancy from 2000 to 2010. Best fit trend lines are fitted: exponential for lions, hyenas and leopard, polynomial order 6 for wild dogs and linear for cheetah

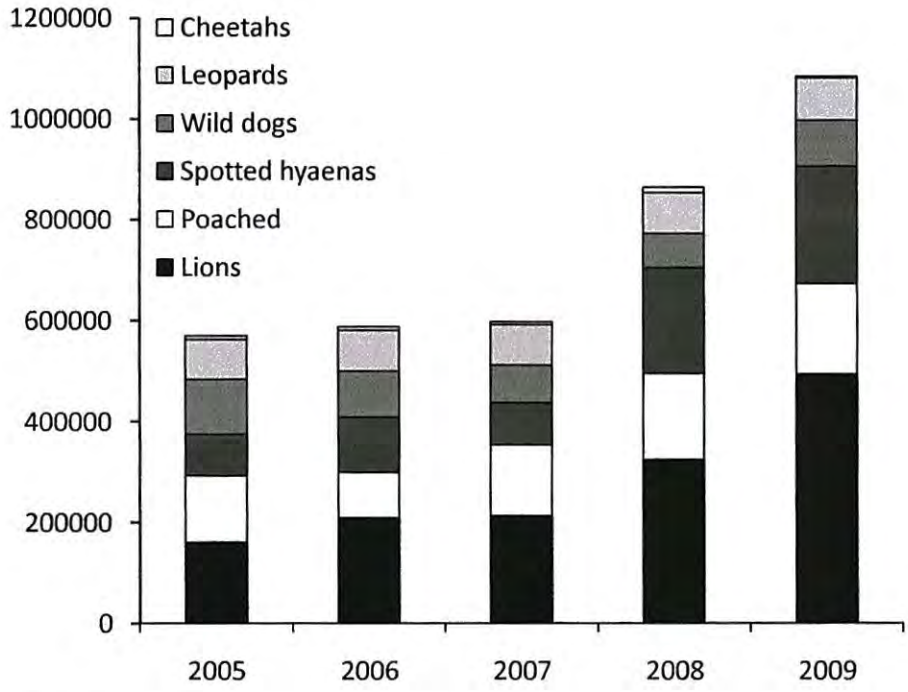


Figure 4. Stacked bar graph depicting the proportional economic losses in US dollars lost in the SVC to the five main predators and poaching from 2005 to 2009

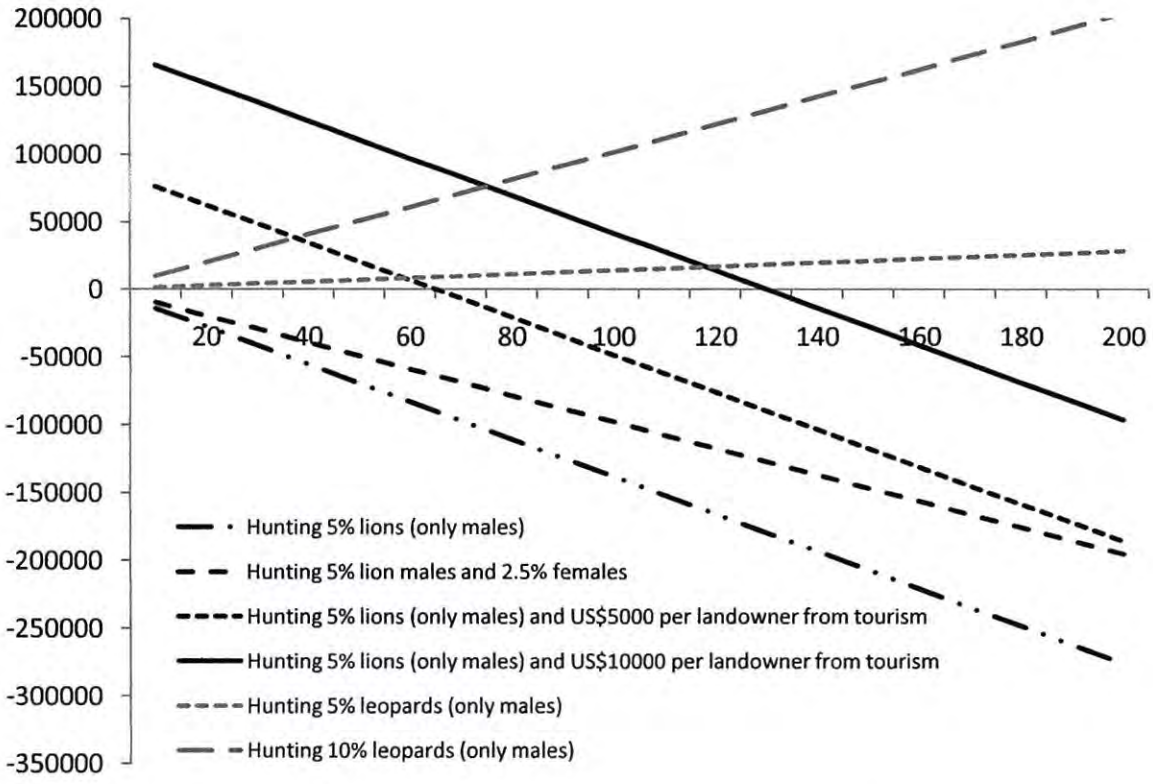


Figure 5. Projected net benefits of trophy hunting and photo-tourism based on 2009 trophy and day hunting fees for landowners in the Savé Valley Conservancy using various hunting offtake percentages. Number of individuals is displayed on the X axis.

Carnivore Densities in the Savé Valley Conservancy

Results of the 2017 Spoor Survey & Wild Dog Monitoring Project

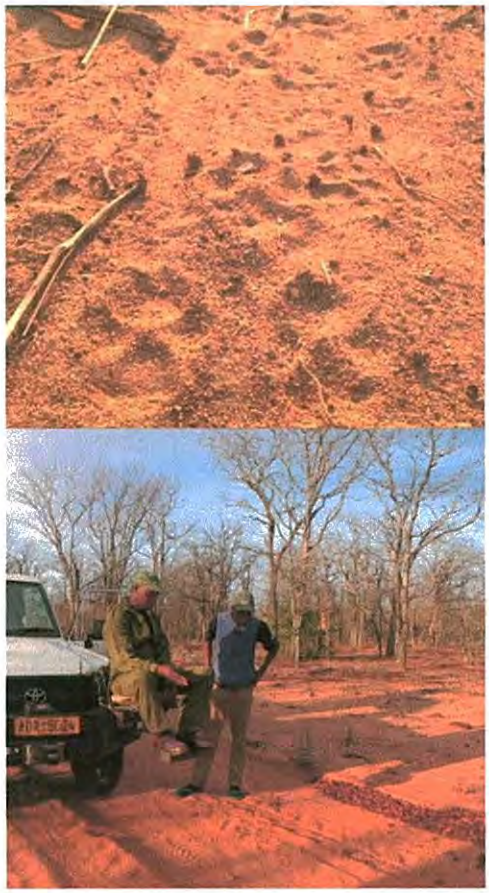
Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

Introduction

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

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

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



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

Methodology

The 2017 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of

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

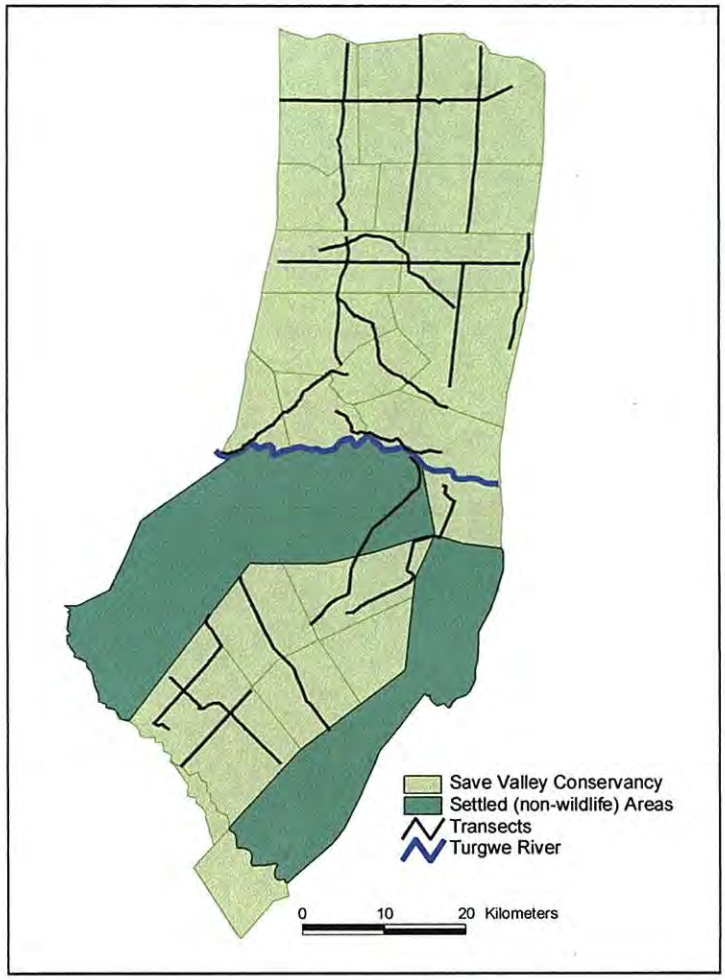
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

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

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

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

Figure 1. Map of the transects driven – October 2017



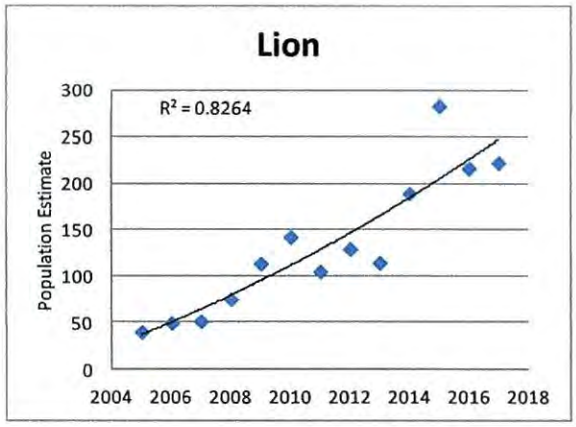
Results

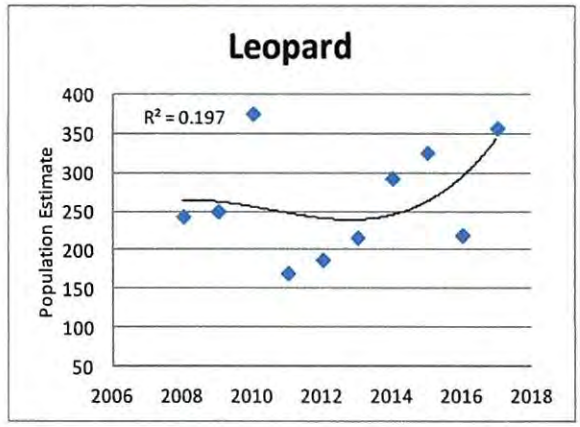
Table 1: Summary of survey parameters (2017)

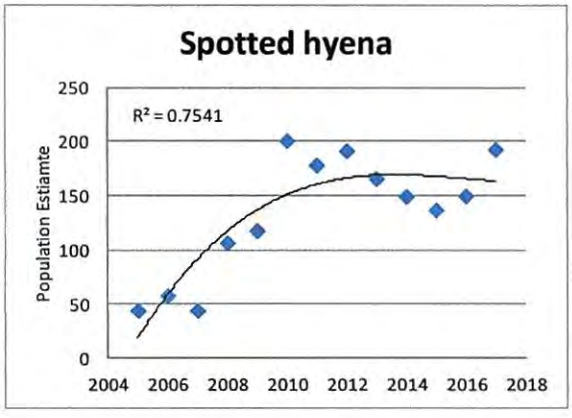
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

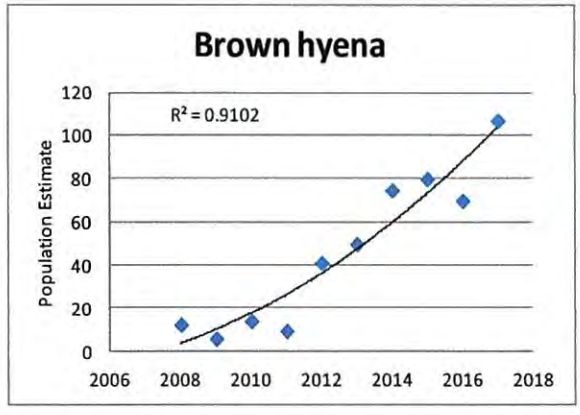
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs).

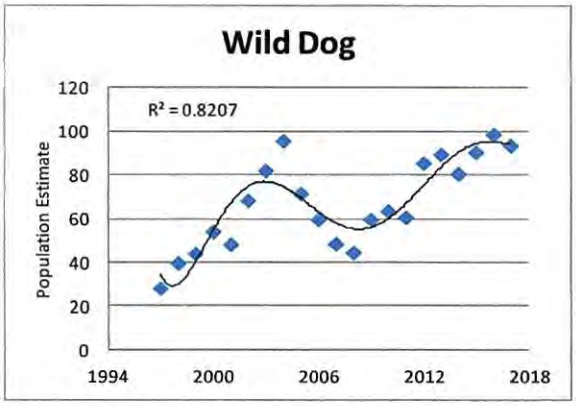
Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223
Leopard				245	252	378	172	189	218	295	328	221	359
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193
Brown hyena				12	6	14	10	41	50	75	80	70	107
African Wild dog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











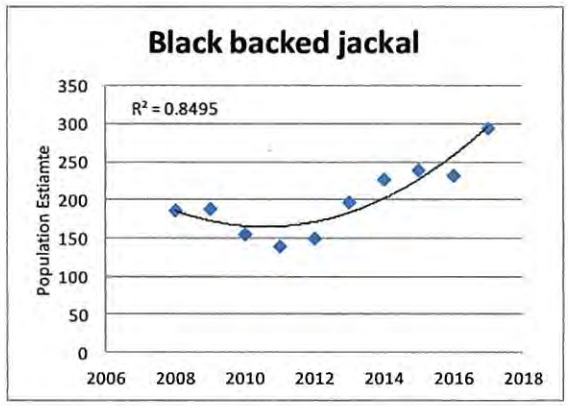


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken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

Discussion

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

Interpretation of results for each species

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Word of caution

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

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

Acknowledgements

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

NORTH SVC Species	Survey Area North SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	1639	278.042434	Leopard (Y=0.6993X)	16.96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011
Brown hyaena	1639	92.3646238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484
Cheetah	1639	3.848525992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369
Civet	1639	759.0999784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569
Honey Badger	1639	119.1610431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147
Leopard	1639	291.2825499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916
Lion	1639	188.5777736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906
Spotted hyaena	1639	138.5469357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727
Wild dog	1639	277.0938714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453
African Wildcat	1639	22.06685984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421

SOUTH SVC Species	Survey Area South SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	800.57	27.21437644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111
Brown hyaena	800.57	16.95095785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0
Civet	800.57	233.2660838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667
Honey Badger	800.57	3.887768063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.694444444
Leopard	800.57	73.86759319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.19444444
Lion	800.57	38.98720305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.97222222
Spotted hyaena	800.57	55.9381609	Lion (Y=0.3049X)	6.987291667	144	33	4.363636364	144	5.559513889	22.91666667
Wild dog	800.57	44.0724904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	0

TOTAL SVC	Survey Area	Est. population	Equation Used	Est. density	Distance covered	No. of spoor	Spoor frequency	Transect length	Penetration	Spoor density
	Total SVC	(Total area)	Stander1998	(Animals/100km2)	(km)	counted	(km/spoor)	(km)	(Area/length)	(Spoor/100km)
Species	(Km2)			Y=0.3049X	Sum of transects			Sum of routes		
				Y=0.6993X						
Black-backed jackal	2439	295.7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862
Brown hyaena	2439	106.8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429
Cheetah	2439	3.684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389
Civet	2439	980.1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714
Honey Badger	2439	118.2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448
Leopard	2439	359.11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904
Lion	2439	222.8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204
Spotted hyaena	2439	193.4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293
Wild dog	2439	313.1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808
African Wildcat	2439	21.12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473

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Date: 2020.08.13 15:09:24 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING

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Date: 2020.08.13 14:05:14 -04'00'

To: Permit File PRT- 12867D

Enhancement Finding

Applicant: Scott Ross Somers (PRT–12867D)

Introduction

Scott Ross Somers submitted an application on October 16, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken on June 09, 2018, from the Savé Valley Conservancy (SVC), Chishakwe Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

Hunting, Management, and Utilization of Lions

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Scott Ross Somers hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Somers' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Somers himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Somers supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Somers, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Somers in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Somers' hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Somers' trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Somers' legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Somers, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Somers' legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Somers submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Somers plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Somers' trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Somers' permit request, we find that the expertise, facilities, or other resources available to Mr. Somers appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Somers' participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Somers' permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Somers on June 09, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Scott Ross Somers of Davidson, Michigan.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:14:48 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 12867D, Scott Ross Somers, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:08:31 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence _____** **Nonconcurrence _____**

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA12867D-0
Effective: 08/13/2020 Expires: 08/12/2021

Issuing Office:

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

AMY BRISENDINE Digitally signed by AMY BRISENDINE
Date: 2020.08.13 16:15:21 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:
SCOTT ROSS SOMERS
(b) (6)
DAVIDSON, MI 48423
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

NOV 6 2018

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

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
mahaffey	william	howard	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Winter Park	Florida	32792	orange	US

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 10/31/2018

Please continue to next page

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

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

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

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

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

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

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

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

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

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

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

William Mahaffey (b) (6)

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

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

Panthera Leo, African Lion

b. Sex (if known). Male

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

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

b. Date wildlife is to be hunted:

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

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

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

Shot in Zimbabwe, Masvingo Provence on Bubye Valley Conservancy. gps 011362. nearest town is Beitbridge.

b. Date wildlife was hunted:

July 11, 2018

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

Pete Fick Safaris. Professional Hunter Paul Zorn

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

Mazunga Safaris 8 Norfolk Road Hillside, Bulawayo, Zimbabwe

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

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

Name:	
Business Name:	Mazunga Safaris
Address:	8 Norfolk Road Hillside
City:	Bulawayo, Zimbabwe
State/Province:	
Country, Postal Code:	

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

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

The Lion population on Bubye Valley Conservancy is astounding. They have ongoing scientific lion research taking place at all times.

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

$100,000 some of the funds are used for anti poaching and scientific research.

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

no

OMB Control No. 1018-0093
Expires 08/31/2020

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

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

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

    Taxidermist/Broker's signature: _____ Date: _____

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

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

    Applicant's signature: (b) (6) _____ Date: 10/31/2018

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

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

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE
Date: 2020.08.13 13:26:00 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 15066D

JENNA KING Digitally signed by JENNA KING
Date: 2020.08.13 11:41:28 -04'00'

Enhancement Finding

Applicant: William Howard Mahaffey (PRT– 15066D)

Introduction

William Howard Mahaffey submitted an application, received by the Service on November 06, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken July 11, 2018, from the Bubye Valley Conservancy, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when the import activity qualifies for and the Service issues an ESA threatened-species

enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can

contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. If communities that

share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making ESA enhancement findings for the import of sport-hunted trophies of lions on an

application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

Hunting, Management, and Utilization of Lions

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

William Howard Mahaffey hunted in the Bubye Valley Conservancy (BVC) in Zimbabwe. Based on information submitted with the permit application, the Bubye Valley Conservancy (BVC) is reportedly one of largest private wildlife areas in Zimbabwe with a total area of approximately 3,400 km^2. The land that now occupies BVC was historically a cattle ranch, and in 1994 the BVC was established and land use converted through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting.

In evaluating whether the importation of Mr. Mahaffey's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Bubye Valley Conservancy and Mr. Mahaffey himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Save Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species.

Sport hunting was essential for the successful transition of the BVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the

conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over US $100,000 per year. The BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but it is also empowered by job opportunities created both within these communities, as well as in the BVC (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Mahaffey supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Mahaffey, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Mahaffey in the hunting and subsequent import of the trophy lion he harvested in the BVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Mahaffey's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these

authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Mahaffey's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Mahaffey's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Mahaffey, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, reportedly, USD 590,000 was spent on anti-poaching efforts by BVC alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Mahaffey's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Mahaffey submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Mahaffey plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Mahaffey's trophy lion increases the funds available to the Zimbabwe Government and BVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Mahaffey's permit request, we find that the expertise, facilities, or other resources available to Mr. Mahaffey appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Mahaffey's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Mahaffey's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Mahaffey on July 11, 2018, from the Bubye Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to William Howard Mahaffey of Winter Park, Florida.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The hushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 11, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 11:44:45 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 15066D, William Howard Mahaffey, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

Signature: AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 13:26:42 -04'00' Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA15066D-0
Effective: 08/14/2020 Expires: 08/13/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.14 07:59:51 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

WILLIAM HOWARD MAHAFFEY
(b) (6)
WINTER PARK, FL 32792
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
mahaffey	william	howard	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
	(b) (6)		

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Winter Park	Florida	32792	orange	US

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 10/31/2018

Please continue to next page

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

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

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

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

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

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

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

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

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

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

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

William Mahaffey (b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

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

Panthera Leo, African Lion

b. Sex (if known). Male

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

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

b. Date wildlife is to be hunted:

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

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

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

Shot in Zimbabwe, Save Valley Conservancy. nearest town is Beitbridge. Savuli Hunting area.

b. Date wildlife was hunted:

Agust 20, 2016

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

Professional Hunter Paul Zorn

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

Collets Wildlife Artistry
15 Josiah Chinamano Road, Belmont
Bulawayo, Zimbabwe

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

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

Name:	
Business Name:	Collets Wildlife Artistry
Address:	15 Josiah ChinamanoRoad, Belmont
City:	Bulawayo, Zimbabwe
State/Province:	
Country, Postal Code:	

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

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

The Lion population on Save Valley Conservancy is astounding. They have ongoing scientific lion research taking place at all times.

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

$50,000 some of the funds are used for anti poaching and scientific research.

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

no

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: (b) (6) _____ Date: 10/31/18

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

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

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:03:59 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 14:34:09 -04'00'

To: Permit File PRT- 15067D

Enhancement Finding

Applicant: William Howard Mahaffey (PRT–15067D)

Introduction

William Howard Mahaffey submitted an application on November 06, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken on August 20, 2016, from the Savé Valley Conservancy (SVC), Savuli Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

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

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

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

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

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

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

Hunting, Management, and Utilization of Lions

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

William Howard Mahaffey hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Mahaffey's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Mahaffey himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

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

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

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

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

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

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Mahaffey supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Mahaffey, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Mahaffey in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Mahaffey's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

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

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Mahaffey's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

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

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Mahaffey's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Mahaffey, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Mahaffey's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

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

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

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

Mr. Mahaffey submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Mahaffey plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Mahaffey's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Mahaffey's permit request, we find that the expertise, facilities, or other resources available to Mr. Mahaffey appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Mahaffey's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Mahaffey's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Mahaffey on August 20, 2016, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to William Howard Mahaffey of Winter Park, Florida.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / jan/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:15:40 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 15067D, William Howard Mahaffey, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:04:46 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence _____** **Nonconcurrence _____**

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA15067D-0
Effective: 08/14/2020 Expires: 08/13/2021

Issuing Office:

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

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.14 08:03:14 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
WILLIAM HOWARD MAHAFFEY
(b) (6)
WINTER PARK, FL 32792
U.S.A.

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

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

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

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RENEE SNIDER

October 25, 2018

RCVD NOV 19 2018
RCVD NOV 19 2018

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

RE: Import Application of Zimbabwe Lion Trophy for Frank Cavallo

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from Zimbabwe for Frank Cavallo . Also attached to the permit application is enhancement information provided by the Zambizi Hunters Safari Company. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

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

Sincerely,

John J. Jackson III

encl:

- Frank Cavallo's Permit Application, 100.00 Check and Notice of Representation

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

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: FRANCESCO CAVALLO M.D.

Date: 11/13/18

Form 3-200-20

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

OMB Control No 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD NOV 19 2018

LB

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

Type of Activity: Lion Zimbabwe

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cavallo	Francescomaria	Tiberio	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b)(6)	(b)(6)	(b)(6)	(b)(6)

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

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

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (if Broker or Taxidermist is applying on behalf of a foreign national, list's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
El Campo	Tx	77437	Wharton	U.S.A.

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and a understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 10

(b) (6)

11/13/18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo, African lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: 09/16/18

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   Zambezi Hunters

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Trophy Consultants International 4 Josiak Chinamano Rd Belmont, Bulawayo, Zimbabw

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	TROPHY CONSULTANTS INTERNATIONAL
Business Name:	4 JOSIAH CHINAMANO ROAD
Address:	BELMONT
City:	BULAWAYO
State/Province:	ZIMBABWE
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   See attached.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   $44,252

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   See attached.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that [redacted] United States, cannot be re-exported.

    Applicant's signature: [redacted] Date: 11/13/18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SANGO
save valley conservancy

PABST HOLDINGS ZIMBABWE PRIVATE LIMITED

31 October 2018

Replies to questions posed by the US Fish and Wildlife Service for the Male Lion hunted by Mr Frank Cavallo.

For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. *Do you have any information regarding the population status or trend data on the species hunted?* *The male lion was hunted on Sango, a 60'000'Hec property within the Save Valley Conservancy (240'000' Hec) Sango carries a lion population of +/- 80 lion and the Save Valley has a population of 223 lion, these figures from the 2017 predator spoor survey. The lion population in the Save Valley has grown from a population of 40 in 2005 to 223 in 2018 due to good management, and abundant prey populations. The recommended sustainable hunting percentage for male lion is 8%,*
Sango could ask for 6 male lions, in the interests of conservation and sustainable utilisation, Sango normally hunts 2.

b. *In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?*

Total fees paid $..... The fees paid to Sango run the property, they help pay; 130 staff of which 44 are game scouts, water pumping and pipe line repairs, fire breaks, infrastructure maintenance etc. Sango also assists 4 local schools that are situated along its boundaries and maintains 9 community boreholes.

c. *Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?* *Sango was founded in 1993 and has since grown a sizable population of wildlife ,the property is funded by sustainable use conservation (Hunting). The success of Sango can be measured by the fact that Sango restocked 1300 plains game animals into the Gonarezhou and Zambezi National Parks in 2013 and translocated 100 elephant to the Rifa conservation area in the Zambezi Valley in 2018 due to over populations on Sango.*

Please contact me if any further information is needed; David Goosen sangohq@sango-wildlife.com

PABST HOLDINGS ZIMBABWE (PTY) LTD
trading as SANGO RANCH, P.O. Box 24, BIRCHENOUGH BRIDGE, ZIMBABWE
WEB: www.sango-wildlife.com * E-MAIL: sangohq@sango-wildlife.com
PHONE: +263 712 412 574 * +263 712 421 794 * +263 773 080 691

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: ZAMBEZI HUNTERS

   a. Years in business: 40 YRS

   b. Name of company conducting hunt: ZAMBEZI HUNTERS

2. Name of concession: SAVUTI Size in km²: 6000

   a. Land tenure: __ Government lease __ Community __ Private ranch (Private conservancy

   b. Length of concession agreement: N/A Can it be renewed? __ Yes __ No N/A

   c. Length of renewal, if applicable: N/A

   d. Estimated total amount received in trophy fees last year, if applicable: $114 200

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   STANDARD CONCESSION OBLIGATIONS

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   BOTSWANA, NEAREST CITY - KASANE INTERNATIONAL

   g. If the concession borders a national park, please provide the park name: N/A

   h. Description of general and distinctive habitat features and any water features:
   SAVUTI MARSH, MOREMI PARK, 9 DAMS IN MARSH

3. Are there any communities living in the concession? __ Yes (No)

   a. If so, estimated number of people or villages in the concession? N/A

4. Are there communities bordering this concession? (Yes) __ No

   a. If so, estimated number of people or villages around the concession? 3500

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	DENSE	550+	UP	AERIAL COUNT
Lion	DENSE	120	UP	" "
Leopard	DENSE	150	UP	" "
Prey species	DENSE		STABLE	" "

6. Total employment number: 130

   a. Please identify the number and type of all employees:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type:	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	[illegible]	
Trackers	[illegible]	
Anti-poaching scouts/rangers	44	
Other anti-poaching	[illegible]	
Cooks/housekeepers	19	[illegible]
Community coordinators	[illegible]	
Managers	[illegible]	
Biologists	1	
Others:	[illegible]	

7. Number of staff employed in the off-season: [illegible]

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff			
Managers			
Maintenance			
Road opening/construction	[illegible]		
Community relations personnel	[illegible]		
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 44

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? [illegible]

   c. Months during which anti-poaching patrols are conducted: [illegible]

   d. Number of anti-poaching patrols per month: [illegible]

   e. Description of anti-poaching equipment, vehicles, etc.: [illegible]

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? [illegible]

   g. Do you offer rewards to poaching informants leading to arrest? (Yes) No

   h. Do you offer rewards to poaching informants upon conviction? Yes (No)

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? USD

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts			11 600	
Equipment			11 000	
Vehicles			NIL	
Petrol Diesel			12 120	
Rewards paid			3 000	
Other:				
Other:				
TOTALS			147 520	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered			16	
Elephant carcasses observed			NIL	
Lion carcasses observed			NIL	
Leopard carcasses observed			NIL	
Ivory poachers arrested			NIL	
Meat poachers arrested			16	
Other poachers arrested			NIL	
Poachers convicted			16	
Snares/gin traps collected			NIL	
Firearms confiscated			NIL	
Vehicles confiscated			NIL	
Bicycles confiscated			NIL	
Boats/nets confiscated			NIL	
Tusks recovered			NIL	
Other:				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? (Yes) ___ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? [illegible]

c. Does the company provide game meat to nearby communities? ___ Yes ___ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: [illegible]

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NIL

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? USD

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other:				
Other:				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2 2016: 1 2017: 0	2015: 2 2016: 2 2017: 1	2015: 5 2016: 4 2017: 3	2015: 2016: 2017:
Percentage of U.S.	2015:	2015:	2015:	2015:

clients	2016: 1 2017: 0	2016: 2017: 1	2016: 2017:	2016: 2017: 11
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:

Name: Title:

13 - Annual dart census of all animals species
- Maintenance of cage & trap sites & all camps boreholes
- 40 cage new boreholes
- Significant investment in camps
- Continual research about
- Artificial water provision
- Artificial water provision for property
- Employ ecologist employed to monitor wildlife
- Total cost of management [illegible] Revenue from hunting and [illegible]

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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August 29, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD SEP 11 2019

RE: PRT No. 16345D / Frank Cavallo / Lion Trophy / Zimbabwe

Dear Chief Cogliano:

This is a supplement to our existing application, PRT No. 16345D for a lion trophy import from Zimbabwe for Frank Cavallo.

Please note the GPS Coordinates are: -20.24392, 32.03735
The nearest town is: Masvingo, in the Bikita Concession.

Documents show that the hunting is well managed and governed by science-based quotas and age-based regulation on lawful trophies. Further, the hunting revenues mitigate the three primary threats to lion identified by the U.S. Fish and Wildlife Service by creating incentives to secure habitat, protect lion and their prey base through extensive anti-poaching, and reduce conflicts through benefits for rural communities. Please consider this and the attached documents (listed below) in making a positive enhancement finding for this lion permit.

- Conservation Status for the African Lion in Zimbabwe
- Sport- Hunting and Lion *Panthera leo* Conservation in Zimbabwe

PRT No. 16345D

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez[†1], Dr Rosemary Groom[‡2], Olivia Mufute[§3] and Roseline Mandisodza-Chikerema[¶3]

[1]Bubye Valley Conservation Research Initiative
[2]African Wildlife Conservation Fund
[3]Zimbabwe Parks and Wildlife Management Authority

January 31, 2016

BUBYE VALLEY CONSERVATION RESEARCH
ZIMBABWE

African Wildlife Conservation Fund

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

i – Banning of all lioness hunting in Zimbabwe

ii – Hunting moratoria around the Gonarezhou and Hwange National Parks

iii – Removal of fixed hunting quotas

iv – Age restrictions on sport-hunted lions

v – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land

ii – Lion sport-hunting generates up to US$ 557 km^{-2}

iii – Anti-poaching (in particular that of rhinoceroses) costs ~US$ 216 km^{-2}

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur where the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

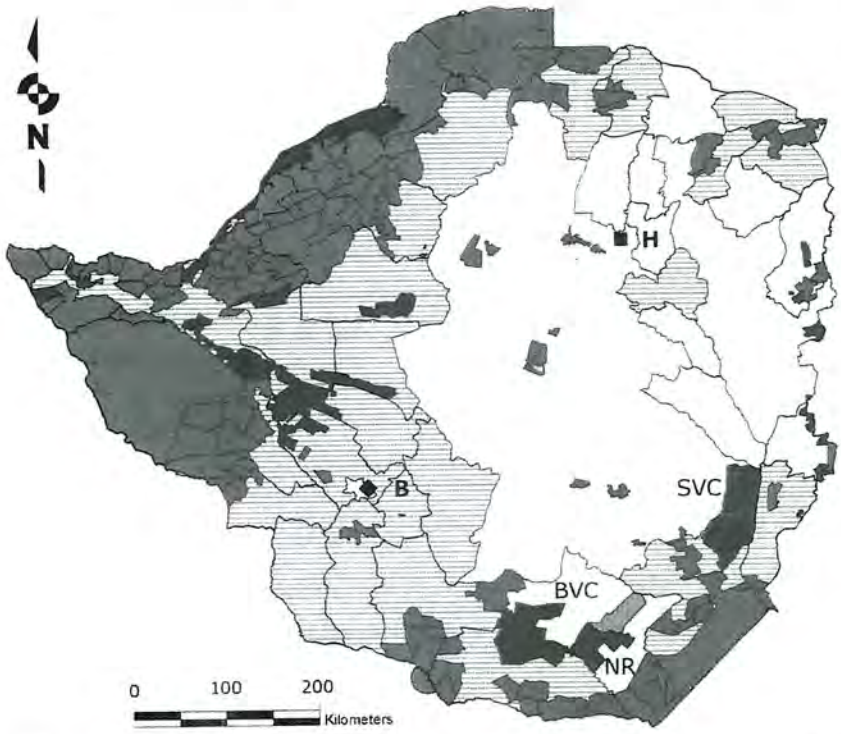


Figure 3: Map of Zimbabwe's main wildlife areas: [*i*] National Parks are represented in light blue; [*ii*] Safari areas are represented in orange; [*iii*] Forestry areas are represented in dark green; [*iv*] Community and Private wildlife areas are represented in light green; [*v*] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [*vi*] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [*vii*] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [*viii*]The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [*ix*] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter 'H'. Bulawayo is represented by a black diamond and letter 'B'. Sport-hunting may occur in areas: *ii, iii, iv, v, vii & viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately $150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

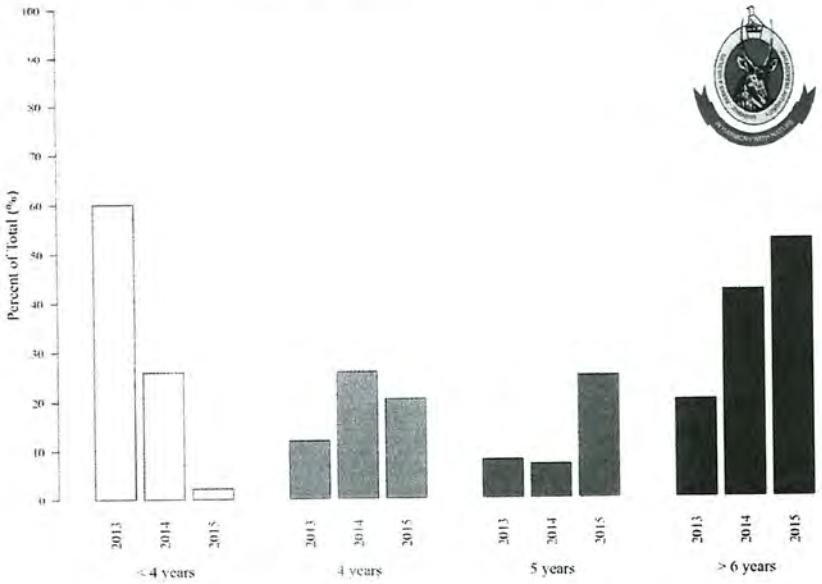


Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

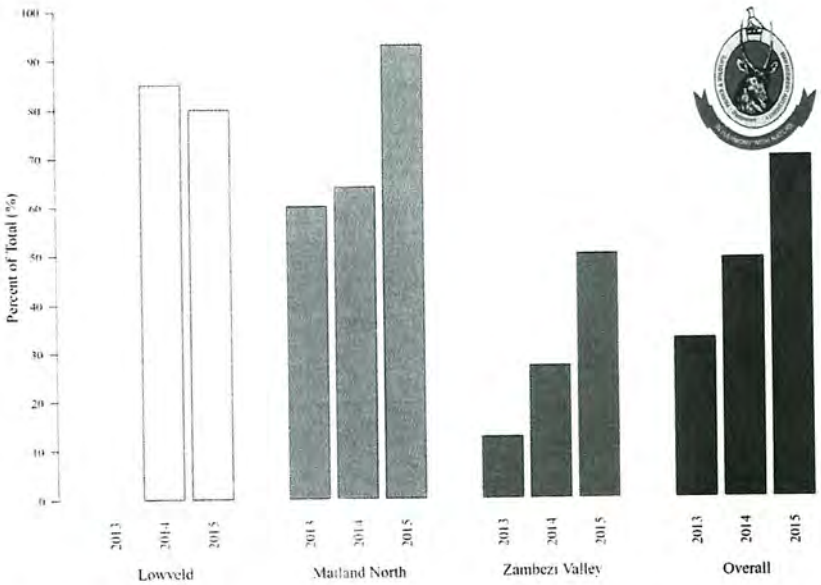


Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

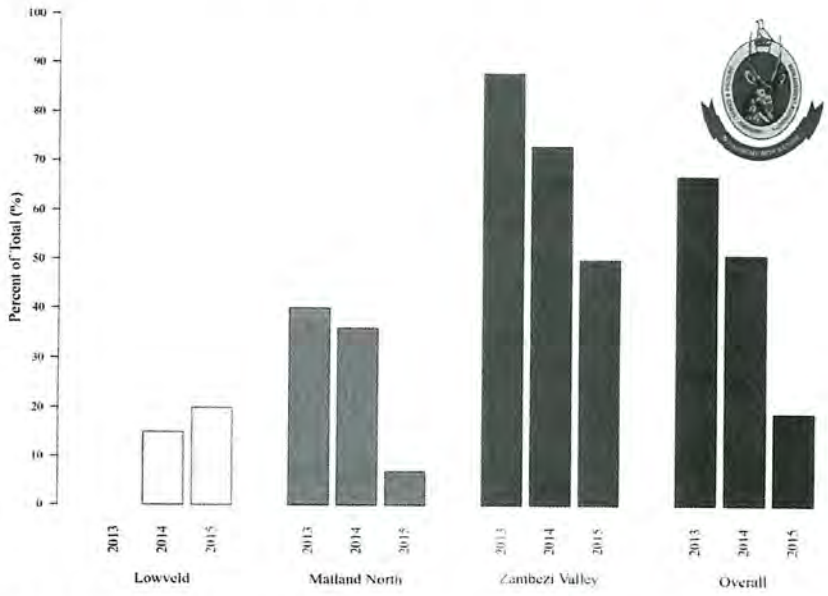


Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	*People Injured*	*People Killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	**44**	**183**	***2***	***7***

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (~0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation. Nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

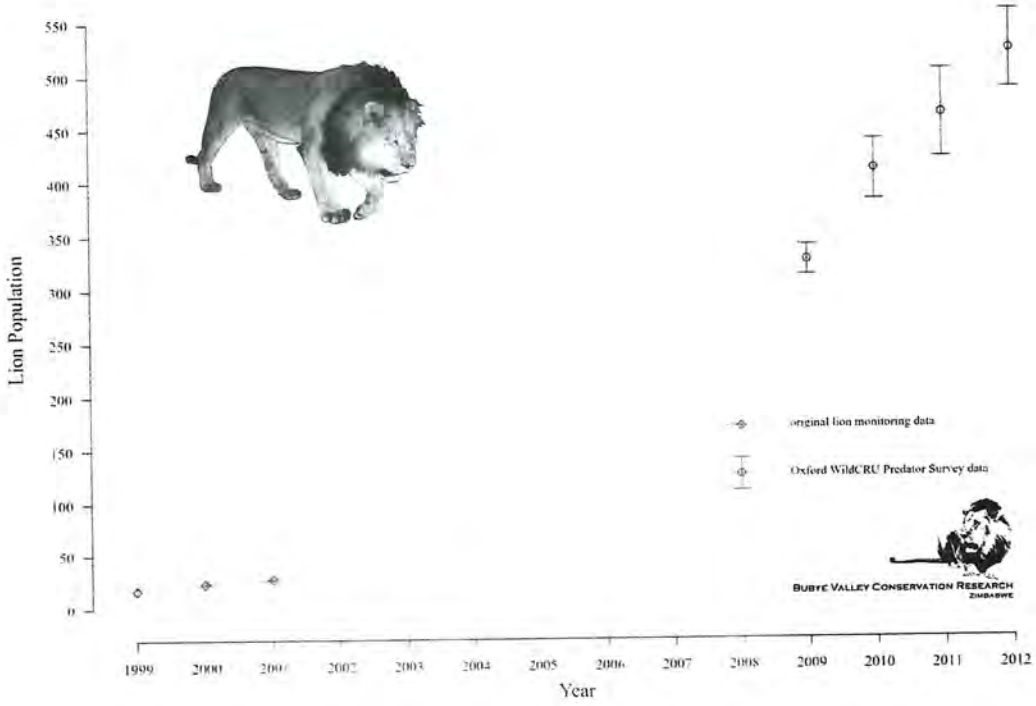


Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water* - Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.* - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Beit Bridge RDC self funding projects up and running* - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange - Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Beit Bridge & Mwenezi districts* - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs andlocal headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations* - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports* - Transport the soccor teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions* - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC* - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b/holes in the Vumhani area are done by BVC* - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project* - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School - Supply of 24 loads of riversand to Mdzwiti School (value $1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of income and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 270 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities and their numbers would have to be reduced significantly.

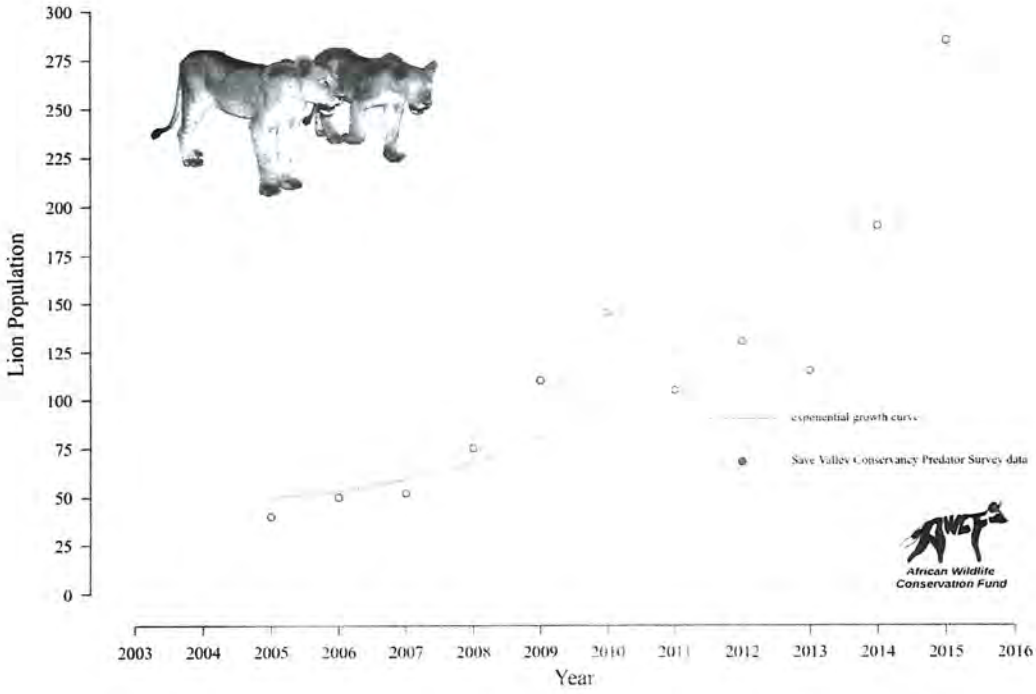


Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (P. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not habituated. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

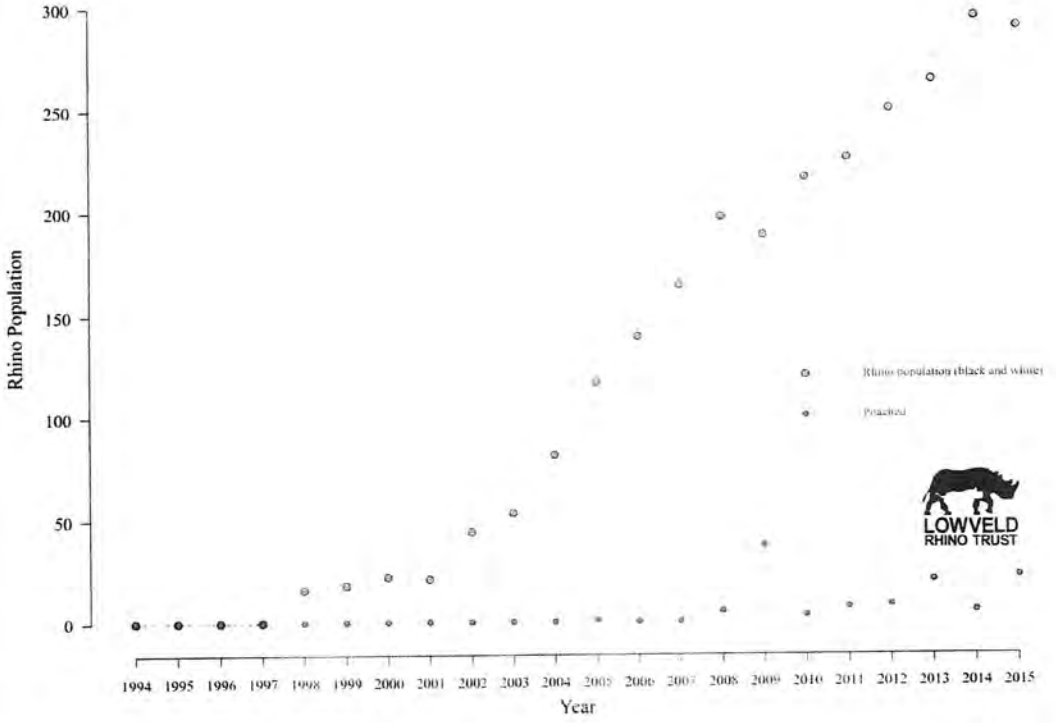


Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration = 18 days [*total daily rate of US$ 53,100 lion hunt^{-1}*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion hunt^{-1}*]

BUBYE VALLEY CONSERVANCY – LION SPORT-HUNTING REVENUE GENERATED (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 year^{-1}), research (approximately US$ 34,700 year^{-1} not including client and sponsor donations), and community support assistance (approximately US$ 210,000 year^{-1}).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-29]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become inviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A fusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value will reduce its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-07-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However this reform is a process being driven from within as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2009 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZPWMA, and that the research assists ZPWMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions clearly contributing to lion conservation in Zimbabwe, having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

REFERENCES

Barnett, R., Yamaguchi, N., Shapiro, B., Ho, S.Y., Barnes, I., Sabin, R., Werdelin, L., Cuisin, J., Larson, G., 2014. Revealing the maternal demographic history of Panthera leo using ancient DNA and a spatially explicit genealogical analysis. Bmc Evolutionary Biology 14.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L., Macdonald, D., Packer, C., 2015a. Lion (Panthera leo) populations are declining rapidly across Africa, except in intensively managed areas. Proceedings of the National Academy of Sciences of the United States of America-Biological Sciences 10.

Bauer, H., Packer, C., Funston, P., Henschel, P., Nowell, K., 2015b. Panthera leo. The IUCN Red List of Threatened Species 2015.

Bauer, H., Van Der Merwe, S., 2004. Inventory of free-ranging lions Panthera leo in Africa. Oryx 38, 26-31.

Becker, M., McRobb, R., Watson, F., Droge, E., Kanyembo, B., Murdoch, J., Kakumbi, C., 2013. Evaluating wire-snare poaching trends and the impacts of by-catch on elephants and large carnivores. Biological Conservation 158, 26-36.

Bond, I., 1993. The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe.

Brassine, M.C., Parker, D.M., 2012. Does the presence of large predators affect the diet of a mesopredator? African Journal of Ecology 50, 243-246.

Child, B., 1988. The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. D.Phil. Thesis, University of Oxford. Oxford, UK.

Child, B., 1993. Using wildlife as a development tool in Zimbabwe.

Creel, S., 2001. Four factors modifying the effect of competition on carnivore population dynamics as illustrated by African wild dogs. Conservation Biology 15, 271-274.

Creel, S., Creel, N.M., 1996. Limitation of African wild dogs by competition with larger carnivores. Conservation Biology 10, 526-538.

Creel, S., Creel, N.M., 1997. Lion density and population structure in the Selous Game Reserve: Evaluation of hunting quotas and offtake. African Journal of Ecology 35, 83-93.

Cumming, D.H.M., 1993. Multispecies systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Davidson, Z., 2009. Lion ecology and socio-spatial impacts of trophy hunting in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Preez, B., Hart, T., Loveridge, A.J., Macdonald, D.W., 2015. Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

du Preez, B.D., 2014. The impact of intraguild competition with lion Panthera leo on leopard Panthera pardus behavioural ecology. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Toit, R., 1989. Proposal for Save Valley Conservancy. Unpublished report for the Intensive Conservation Areas Committee, October 1989, Harare, Zimbabwe

Durant, S.M., 1998. Competition refuges and coexistence: an example from Serengeti carnivores. Journal of Animal Ecology 67, 370-386.

Durant, S.M., 2000. Living with the enemy: avoidance of hyenas and lions by cheetahs in the Serengeti. Behavioral Ecology 11, 624-632.

Funston, P.J., 2008. Conservation and management of lions in Southern Africa: status, threats, utilization and the recreation option. In Management and conservation of large carnivores

in West and Central Africa. eds B. Croes, H.H. Deloze, R. Bauer, pp. 109-131. Leiden, Institute of Environmental Sciences.

Funston, P.J., 2011. The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy.

Funston, P.J., Groom, R.J., Lindsey, P.A., 2013. Insights into the Management of Large Carnivores for Profitable Wildlife-Based Land Uses in African Savannas. Plos One 8.

Groom, R.J., P., W.J., 2015. Carnivore densities in the Savé Valley Conservancy: 2015. Report for the Savé Valley Conservancy.

Hayward, M.W., O'Brein, J., Kerley, G.I.H., 2007. Carrying capacity of large African predators: predictions and tests. Biological Conservation 139, 219-229.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Rickelton, M., Walker, C., Slotow, R., Skinner, J.D., 2007. Restoring lions Panthera leo to northern KwaZulu-Natal, South Africa: short-term biological and technical success but equivocal long-term conservation. Oryx 41, 196-204.

IUCN, 2006. Conservation strategy for the lion in eastern and southern Africa. IUCN SSC Cat Specialist Group, Gland, Switzerland and Cambridge,

IUCN, 2015. The IUCN Red List of Threatened Species. Version 2015-4

Jansen, D.J., Child, B., Bond, I., 1992. Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe

Kettles, R., Slotow, R., 2009. Management of free-ranging lions in an enclosed game reserve. South African Journal of Wildlife Research 39, 23-33

Laurenson, M.K., Wielebnowski, N., Caro, T.M., 1995. Extrinsic factors and Juvenile Mortality in Cheetahs. Conservation Biology 9, 1329-1331.

Leader-Williams, N., Milledge, S., Adcock, K., Brooks, M., Conway, A., Knight, M., Mainka, S., Martin, E.B., Teferi, T., 2005. Trophy hunting of black rhino Diceros bicornis: Proposals to ensure is future sustainability. Journal of International Wildlife Law & Policy and Politics 8, 1-11.

Lindsey, P., du Toit, R., Pole, A., Romanach, S., 200. Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11. pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and implementation of wildlife conservation in southern Africa." Earthscan, London

Lindsey, P.A., Alexander, R., Frank, L.G., Mathieson, A., Romanach, S.S., 2006. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based land uses may not be viable. Animal Conservation 9, 283-291.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Balme, G.A., Funston, P.J., Henschel, P., Hunter, L.T.B., 2015. Life after Cecil: channelling global outrage into funding for conservation in Africa. Conservation Letters 0, 1-6.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Romanach, S.S., Davies-Mostert, H.T., 2009. The importance of conservancies for enhancing the value of game ranch land for large mammal conservation in southern Africa. Journal of Zoology 277, 99-105.

Lindsey, P.A., Romanach, S.S., Tambling, C.J., Chartier, K., Groom, R., 2011. Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx 45, 96-111.

Lindsey, P.A., Roulet, P.A., Romanach, S.S., 2007. Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa. Biological Conservation 134, 455-469.

Loveridge, A.J., Searle, A.W., Murindagomo, F., Macdonald, D.W., 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation 134, 548-558.

Macdonald, D.W., Loveridge, A., Nowell, K., 2010. Dramatis personae: an introduction to the wild felids, In Biology and Conservation of Wild Felids. eds D.W. Macdonald, A.J. Loveridge, pp. 3-58. Oxford University Press Inc., New York, United States.

Miller, S.M., Funston, P., 2014. Rapid growth rates of lion (Panthera leo) populations in small, fenced reserves in South Africa: a management dilemma. South African Journal of Wildlife Research 43, 1-11.

Mills, M.G.L., 1995. Notes on wild dog Lycaon pictus and lion Panthera leo population trends during a drought in the Kruger National Park. Koedoe 38, 95-99.

Mosser, A., Packer, C., 2009. Group territoriality and the benefits of sociality in the African lion, Panthera leo. Animal Behaviour 78, 359-370.

Nowell, K., Jackson, P., 1996. Leopard Panthera pardus, In Wild Cats: Status Survey and Conservation Action Plan, p. 40. IUCN, Switzerland.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., Caro, T., 2010. Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology 25, 142-153.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., Nowell, K., 2009. Sport Hunting, Predator Control and Conservation of Large Carnivores. Plos One 4.

Packer, C., Loveridge, A., Canney, S., Caro, T., Garnett, S.T., Pfeifer, M., Zander, K.K., Swanson, A., MacNulty, D., Balme, G., Bauer, H., Begg, C.M., Begg, K.S., Bhalla, S., Bissett, C., Bodasing, T., Brink, H., Burger, A., Burton, A.C., Clegg, B., Dell, S., Delsink, A., Dickerson, T., Dloniak, S.M., Druce, D., Frank, L., Funston, P., Gichohi, N., Groom, R., Hanekom, C., Heath, B., Hunter, L., Deinough, I.H., Joubert, C.J., Kasiki, S.M., Kissui, B., Knocker, W., Leathem, B., Lindsey, P., MacTavish, S.D., McNutt, J.W., Miller, S.M., Naylor, S., Nel, P., Ng'weno, C., Nicholls, H., Ogutu, J.O., Okot-Omoya, E., Patterson, B.D., Plumptre, A., Salerno, J., Skinner, K., Slotow, R., Sogbohossou, E.A., Stratford, K.J., Winterbach, C., Winterbach, H., Polasky, S., 2013. Conserving large carnivores: dollars and fence. Ecol Lett 16, 635-641.

Pole, A., 1999. The behaviour and ecology of African wild dogs, Lycaon pictus, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland.

Pusey, A.E., Packer, C., 1987. The Evolution of Sex-Biased Dispersal in Lions. Behaviour 101, 275-310.

Schaller, G.B., 1972. The Serengeti Lion: A Study of Predator-Prey Relations. University of Chicago Press.

Smuts, G.L., 1978. Effects of Population Reduction on Travels and Reproduction of Lions in Kruger National Park. Carnivore 1, 61-73.

Spong, G., 2002. Space use in lions, Panthera leo, in the Selous Game Reserve: social and ecological factors. Behavioral Ecology and Sociobiology 52, 303-307.

Suzuki, Y., 2001. Drifting Rhinos and Fluid Properties: The Turn to Wildlife Production in Western Zimbabwe. Journal of Southern African Studies 1, 609-625.

Trinkel, M., Funston, P., Lindsey, N., Hofmeyr, D., Dell, S., Packer, C., Slotow, R., 2010. Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13, 371-379.

Vucetich, J.A., Creel, S., 1999. Ecological interactions, social organization, and extinction risk in African wild dogs. Conservation Ecology 13, 1172-1182.

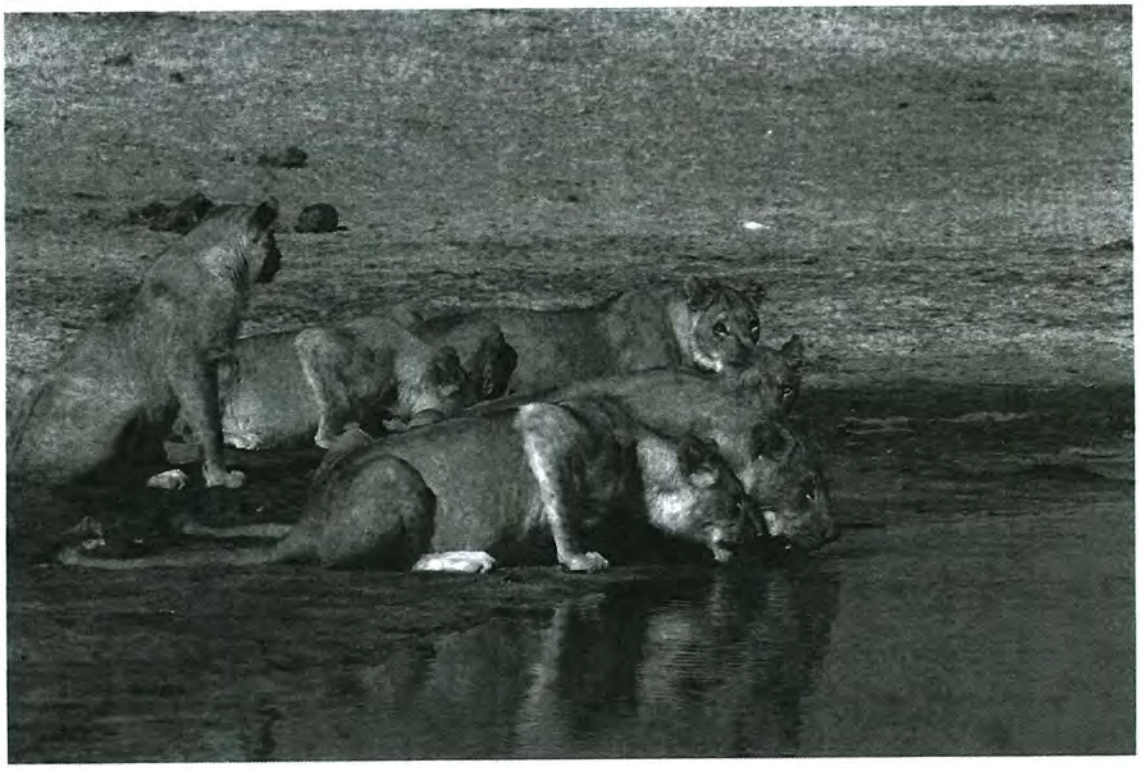
Wegge, P., Odden, M., Pokharel, C.P., Storaas, T., 2009. Predator-prey relationships and responses of ungulates and their predators to the establishment of protected areas: A case study of tigers, leopards and their prey in Bardia National Park, Nepal. Biological Conservation 142, 189-202.

Whitman, K., Starfield, A.M., Quadling, H.S., Packer, C., 2004. Sustainable trophy hunting of African lions. Nature 428, 175-178.

Williams, P.H., Burgess, N.D., Rahbek, C., 2000. Flagship species, ecological complementary and conserving the diversity of mammals and birds in sub-Saharan Africa (vol 3, part 3, pg 258, 2000). Animal Conservation 3, 365-365.

ZPWMA, 2015. Conservation Status of the African Lion (Panthera leo) in Zimbabwe. Unpublished Report for the USFWS.

CONSERVATION STATUS OF THE AFRICAN LION (*Panthera leo*) IN ZIMBABWE



ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
JANUARY 2015

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1.0 INTRODUCTION

The African lion (*Panthera leo*) is an important species that plays a big role in the savannah ecosystem. It is a flagship species with huge social, economic and ecological values. It is a powerful symbol for Africa, and yet living with lions poses hardships for many communities. In some areas, the lion is a major predator on domestic livestock leading to profound conflicts with local communities.

The lion is not only a source of personal and economic damage and danger but is also of economic and personal benefits. The species contributes positively to the livelihoods of local communities through sport hunting. Trophy hunting also contributes to the conservation of lions through financial benefits that are ploughed back into its conservation and that local communities use for rural development programmes. Trophy hunting of the African lion is undertaken through a strict scientific based quota setting process with an objective of ensuring that utilization and any form of harvesting is sustainable.

Zimbabwe is one country that sustainably manages its lion population inside and outside protected areas. The African lion population is increasing in most areas. Research and monitoring of the species is being done collaboratively with external researchers and there is a lot of baseline information and publications. Zimbabwe has a lion management plan and strategy that is being implemented and reviewed on a regular basis. Rigorous monitoring of lion trophy hunting through adaptive management principles is carried out in Zimbabwe and non-detrimental findings are conducted for all exports. In conclusion, harvesting and any other forms of off take are not detrimental to the survival of the African lion in Zimbabwe.

2.0 SPECIES BIOLOGY AND LIFE HISTORY CHARACTERISTICS

2.1 Taxonomy

Class	Mammalia
Order	Carnivora
Family	Felidae
Species	*Panthera leo*
English	African lion
Shona	Shumba
Ndebele	Islwane

African lions are the only social fields, with each pride comprising an average of 4 to 6 adult lionesses, their dependent offspring, and a temporary coalition of pride males. In lion prides there is no dominance hierarchy amongst lionesses, and female lions are "free agents'' who only contribute to communal care when they have cubs of their own. Although the pride is a stable social unit, it is a fission–fusion social group, in which individuals are typically found in a range of subgroup sizes and compositions. Although earlier studies suggested otherwise, grouping patterns within lion prides are not associated with foraging efficiency or any other aspect of hunting. However Packer *et al.*, (1990) concluded that group territoriality and group defence of cubs are the main reasons for sociality in lions. Mosser *et al.*, (2009) conclude that female sociality has largely to do with interactions between neighbouring prides supporting the group territorial hypothesis. Larger prides/subgroups usually win encounters with neighbouring prides (Packer *et al.*, 1990; Grinnell *et al.*, 1995). Larger prides are generally found in higher quality habitats, which typically have numerous buffalo herds and several river confluences (Mosser 2008). The threat posed by neighbours leads to larger group sizes than does the threat of infanticide (Mosser *et al.*, 2009). Cooperative defence against infanticide is another benefit of grouping for female lions (Pusey & Packer 1994). Playback experiments revealed that pride with dependent cubs typically retreat from foreign males, but that lionesses approach female intruders (Mc Comb et al., 1993, 1994).

Leaving cubs unprotected puts them at considerable risk, suggesting that the need to respond to territorial threat may often override the value of protecting cubs. Cooperative defence against infanticide is another benefit of grouping for female lions (Pusey & Packer 1994).

Although pride males are not always with the pride they fulfil a key function defending the pride and chasing off would be invading or "infanticidal males". In order to do so, males typically form coalitions of two or three males, with solitary males seldom being able to defend a territory. Territories are defended through roaring, patrolling, scent marking and direct aggressive encounters. Importantly male lions impact their reproductive success, mortality and wounding of females. Neighbouring resident males also influence the female grouping patterns within larger prides, and improve the quality of their own pride"s territory. Thus male lions are important in group-territorial competition and may use lethal aggression to tip the balance of power in favour of their prides (Mosser et al. 2009). Numerical advantage may additionally benefit large male coalitions by reducing levels of inter-pride competition for their females. The effects of intergroup competition between females are direct and immediate, so much so that male coalitions attempt to modify the dynamics of territorial competition. Group-territorial competition therefore provides strong selection for sociality in both male and females lions. Lions are matrilineal (females stay in their natal pride), with one-third of females dispersing to form new prides (Pusey and Packer 1987). Males leave their natal pride by the age of 4 years and remain solo or form a coalition with other males (Pusey and Packer 1987). Large coalitions of young males (4-5 years of age) are able to easily oust single pride males from their territories, and in areas with no males older than six years of age successfully maintaining reproduction in lion prides

Although there is *not yet any empirical evidence* on how the group territorial nature of lions is affected by excessive trophy hunting, the findings from Mosser *et al.*, (2009) suggest that these could be substantive. Without males to co-operate in group territorial defence lionesses might:

- Have to alter their groupings patterns (which may have as yet not described negative consequences)
- Lose more cubs to infanticide, both from foreign males and ***importantly to lionesses from neighbouring prides*** that will kill cubs if the opportunity exists
- Experience higher wounding and mortality rates

3.0 LION DISTRIBUTION AND RANGE

In Zimbabwe, lions are found in three broad land use types, namely gazetted protected areas (parks estate and indigenous forest areas), CAMPFIRE areas and on private land.

3.1 Parks and Wildlife Estate

Parks Estate is under the jurisdiction of the Zimbabwe Parks and Wildlife Management Authority and covers about 13% of the area of the country (390 580 km^2). The Parks Estate comprises six categories of protected areas that are gazetted under the Parks and Wildlife Act, Chapter 20:14. The six categories of protected areas are national parks, recreational parks, sanctuaries, safari areas, botanical reserves and botanic gardens. In these areas, wildlife is the primary and only land use permitted except in botanic gardens.

The African lions occur in most of Zimbabwe Parks and Wildlife Estates with the exception of a few areas located in the high and central parts of the country i.e. Matopos National Park, Sebakwe, Ngezi, Chivero, Kyle and Chegutu Safari Area. There are no free ranging lions found in the country's recreational parks, which are located in areas of high human densities where conventional agricultural practices in the surrounding areas preclude the establishment of viable population sizes.

Recreational Parks are not suitable for lions due to the small size of the areas, existing prey base and are therefore subject to high human-wildlife conflict. Most of the National Parks and Safari Areas located on the borders of the country support lion populations. Connectivity of lion range has been enhanced by the creation of Transfrontier

Conservation Areas such as Greater Limpopo Transfrontier Park (GLTP) and Greater Mapungubwe Transfrontier Conservation Area. Trophy hunting of wildlife is legally permitted in safari areas. There are sixteen safari areas found in the country and lions are found in Matetsi in the north-western area, Chete, Chirisa (in the Sebungwe region), Charara, Hurungwe, Sapi, Doma (in the Zambezi Region), Malipati (South-eastern part of the country) and Tuli safari areas (Figure 1).

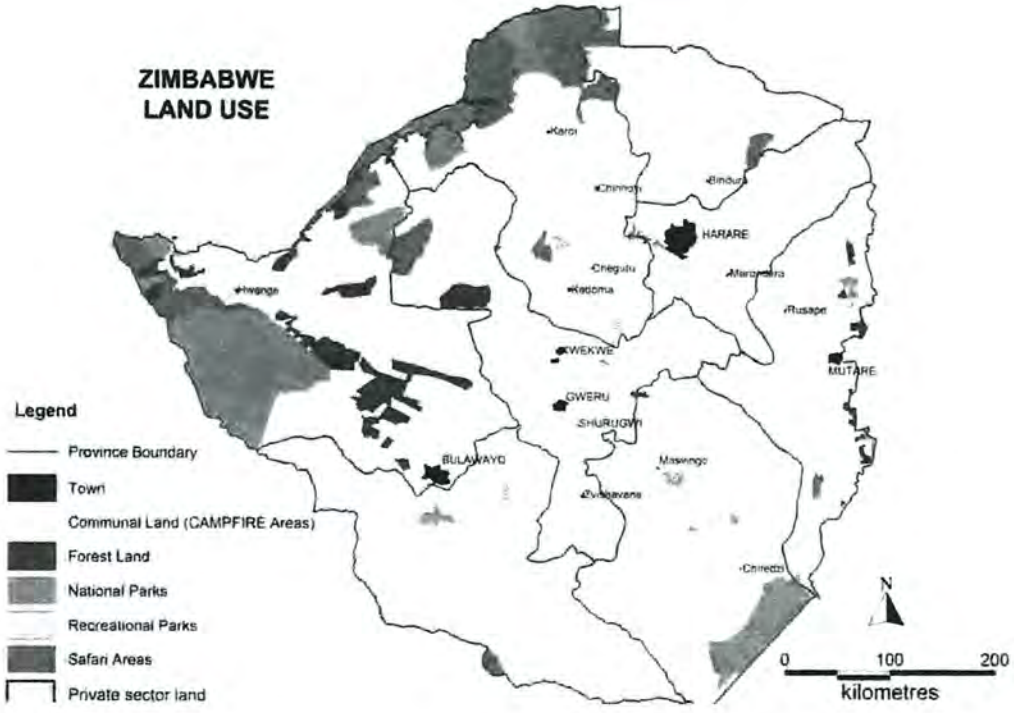


Figure 1: Map of Zimbabwe showing areas where trophy hunting is legally permitted.

3.2 Gazetted Indigenous Forest Areas

According to the Forest Act, Chapter 19:05, twenty-four gazetted indigenous forest areas

are under the jurisdiction of a State parastatal, Forestry Commission and cover about 880 000 ha (2%) of the area of the country. In gazetted indigenous forest areas, lions are found and hunted in Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira and Gwampa Forests. The above mentioned State gazetted areas are found on Kalahari sands in the north-western part of the country Zimbabwe.

3.3 Private Land

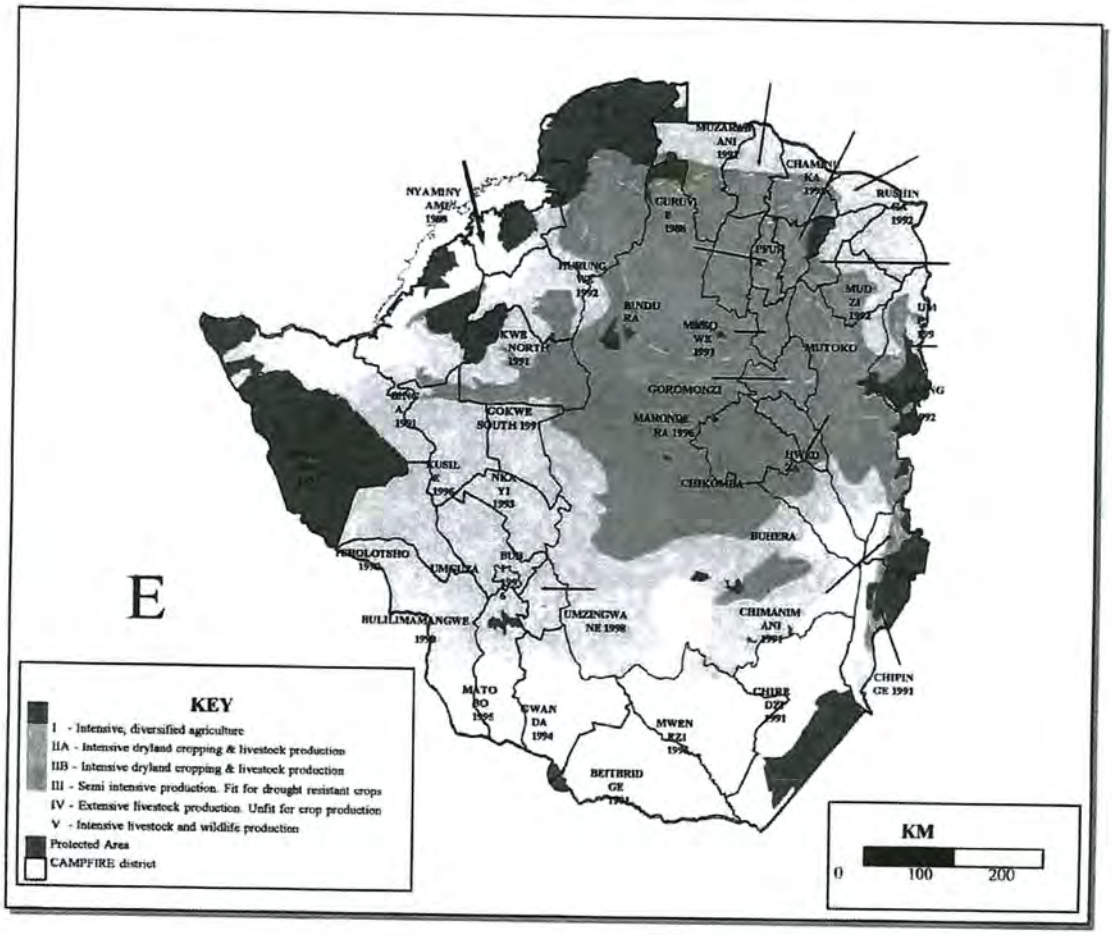
In 1960's there was a shift in wildlife policy from State control to individual proprietorship for white commercial farmers who could now benefit financially from the wildlife on their farms. In 1975, the Parks and Wildlife Act 14/1975 gave commercial farmers the right to exploit wildlife, including lions on their land. The Act legally formalized the policy shift towards sustainable utilization by aiming to confer privileges on owners or occupiers of alienated land as custodians of wildlife. The Act designated these owners or occupiers of alienated land as Appropriate Authorities over wildlife. On commercial private land, lions are found on single ranches and on conservancies. A conservancy is defined as a contractually legitimated entity which involves two or more recognized land and resource authorities. Most of the private farms that have lions are adjacent to major gazetted protected areas.

3.4 Communal Area Management Programme for Indigenous Resources

It was until 1982 that the right to exploit wildlife was extended to communal areas through granting the Appropriate Authority Status over their wildlife resources to Rural District Councils. Such Authority allows Rural District Councils to manage and benefit from wildlife resources occurring in them. The intention was to return rights of access to natural resources through legislative change, devolve responsibility and economic empowerment. The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) is the process through which Government is devolving the management of wildlife resource to communal farmers. Currently (January 2015), 58 Rural Districts have been granted the Appropriate Authority status to manage wildlife

resources in their areas. Lions are found in communal areas that are adjacent to major protected areas (Figure2). Lion hunting is allowed in CAMPFIRE districts. Outside of protected areas, lions largely exist on areas peripheral to National Parks.

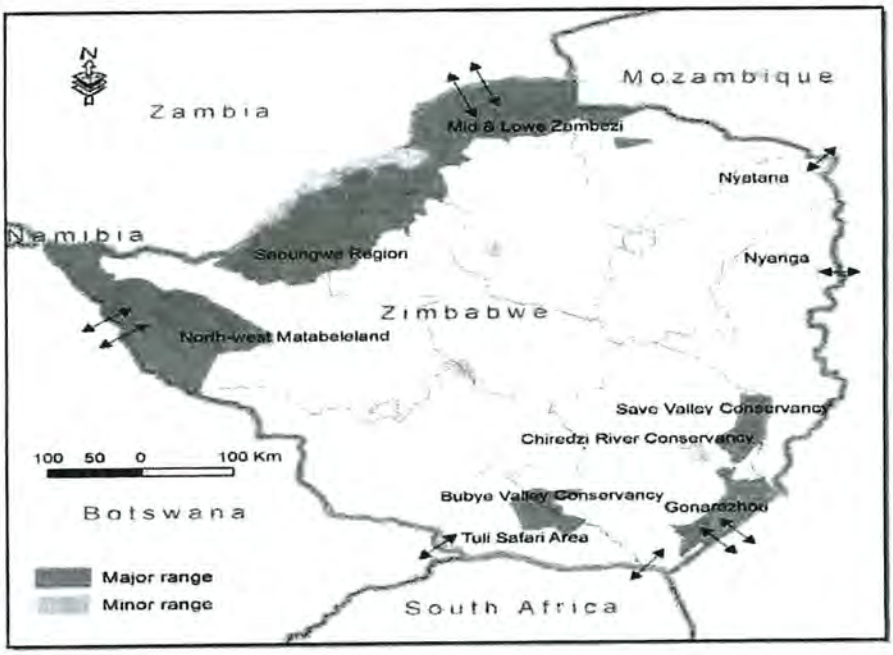
Figure 2: Map of Zimbabwe showing CAMPFIRE districts.



3.5 Summary Distribution of Lions

Figure 3 shows a summary of the distribution of lions in Zimbabwe. The distribution of the African lion in Zimbabwe coincides with the major wildlife areas in the country; which are as follows, the North West Matabeleland Region, Sebungwe Region, the Mid-Lower Zambezi valley and South-Eastern part of the country (Gonarezhou National Park, Save Valley Conservancy, Chiredzi River Conservancy, Malilangwe Conservancy, Beitbridge-Tuli complex). Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem which is about 25000 km^2, the Mid Zambezi Valley (17127 km^2), Sebungwe (15622 km^2) and the South East Lowveld (11000 km^2) (Table 3). In addition to the main geographic ranges listed above, lions are found on privately owned game farms, conservancies, and isolated state protected areas throughout the country. Occasional African lion sightings have been recorded in other areas from time to time such as Nyanga National Park in Zimbabwe's Eastern Highlands and Nyatana Wilderness in the North Eastern border with Mozambique.

Figure 3: African Lion (*Panthera leo*) Range in Zimbabwe (Zimbabwe Parks and Wildlife Management Authority, 2014)



3.6 Threats to Lion conservation in Zimbabwe

Human-Lion Conflicts

Butler in 2000 noted that countrywide in Zimbabwe's communal lands, 1 to 2% of cattle and 3.4% of goats were taken by predators. In the years 1999 to 2001, 32 reports were made in Nyaminyami District in Mashonaland West, with approximately 50 goats, 13 donkeys and one lion destroyed per year (Chardonnet at al, 2010). In traditional agro-pastoral regions, bordering National parks, livestock predation is a serious problem. In Gokwe communal lands 82 livestock, small and large were killed by lions (Butler 2000).

From 2002 to 2006, in all CAMPFIRE Rural District Councils, 58 Lions were reported as Problem Animals and of these, only 36 reports were attended to resulting in 9 lions being killed. In Mbire Rural District Council, 6 people were killed by lions and 12 lions were killed on Problem Animal Control in 2010 (CAMPFIRE Annual Report).

Human- lion conflict is a significant issue in areas around Hwange National Park where lions come into contact with local communities. Conflict is most intense in the wet season (November- April) when wild prey is sparsely distributed. Over 600 head of domestic stock have been lost directly adjacent to Hwange National Park between 2007 and 2011. Retaliatory killing accounts for close to 40% of recorded lion mortality, suggesting that this may be a significant threat to the population.

Depletion of prey base

Lion presence and abundance in an area is related to the abundance of its prey species which include zebra, buffalo, wildebeest, sable, impala and warthog. Depletion of this resource base in an area mostly through human activities such as poaching, settlement and livestock grazing leads to human-lion conflict as lions replace their natural prey base with livestock. For instance, an incursion by a lion pride in 2007 from Mozambique, into Nyanga National Park, which has a low prey density, resulted in the lions mauling and killing eight horses which

were used by the Parks Authority for conducting horse rides, in addition to killing livestock in settled areas, surrounding the park.

Habitat Loss

In Zimbabwe the threat to lions from habitat loss exists in the Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by an increasing human and livestock populations surrounding these areas. In these areas, habitat loss, reduction in prey populations and killing of problem lions are the major threats to long term lion survival.

Due to the large size of the protected area system in the Zambezi Valley and North West Matabeleland, threats are limited to lion range which extends into adjacent settled areas. The huge natural prey base in these protected areas, reduced killing of problem animals associated with lions preying on livestock in adjacent settled areas.

Within their range areas, lions dominate the carnivore guild with site-specific competition affecting the distribution and abundance of other large carnivores (cheetahs, Africa wild dogs, hyenas and leopard).

Diseases

Diseases do not appear to be a major issue in Zimbabwe lion population. Recent disease screening reveals an absence of Tuberculosis (TB) and Feline Leukemia (FeLV) in the South Eastern Lowveld. Nine of the sixteen lions sampled for Feline Immunodeficiency Virus (FIV) showed a positive reaction to the test in Hwange National Park. However it is thought that FIV has little clinical effect on lions and this is therefore unlikely to be a threat. FIV is prevalent in many wild populations (Loveridge 2011 pers comm).

4.0 SURVEY METHODOLOGY

The population estimates of African lions in Zimbabwe are determined through carnivore spoor surveys, systematic lion collaring and call-up surveys. With the strategy to maintain the wilderness values of most protected areas, there is low road penetration in the parks estates, however all suitable roads are used as transects, and in areas of suitable substrate, spoor surveys have shown to be an effective and efficient means to assess wildlife

densities (Stander 1998: Fuston et al. 2001; Davidson and Romanach 2007). Patrol reports, field observations by Zimbabwe Parks and Wildlife Management Authority rangers and other sightings by tour operators and tourists also contribute to knowledge of the status of lions in Zimbabwe's protected areas. Between 2006 and 2012 leopard and lion spoor surveys were conducted in the major wildlife areas. The surveyed areas are shown in the map in Figure 4. A total of 28 sites were surveyed between 2006 and 2012. The survey covered the major areas within the lion range in the country. The survey sites covered 48123km^2 **(12% of the country)** and 14 400km of transects.

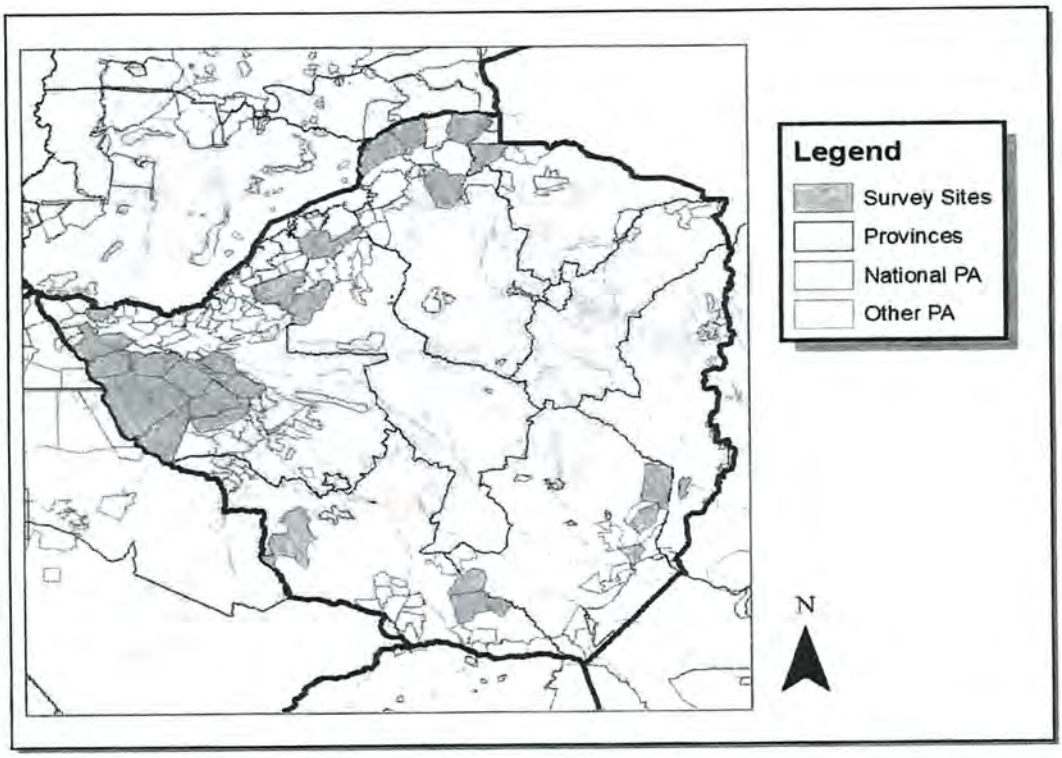


Figure 4: African Lion Survey Sites in Zimbabwe (2012)

Lion population surveys provide useful indices of abundance that can be used to determine spatial distribution, as well as temporal trends in population numbers. Different survey methods are conducted in most of the wildlife estates and areas of minor distribution for purposes of generating information for setting sustainable lion trophy hunting quotas and for population management. In most protected areas, lions compete

for food with other carnivores such as spotted hyenas, leopard and wild dog. Carnivore density information can offer early warnings about conservation needs, and provide information for successful future management as well as offer input for decisions regarding hunting quotas or any management requirement. Moreover, carnivore density trends are a reflection of prey densities and therefore save as useful indicator (Conservation Strategy and Action plan for the Lion (*Panthera leo*) In Zimbabwe, 2006).

5.0 POPULATION ESTIMATES

The lion population estimate at national level ranges from 1700 to 2043 animals (Chardonnet 2002, Bauer and Van Der Merwe 2004) (Table 1). The current lion population estimate for the Hwange Matetsi complex is 750, South Eastern Lowveld 350, between 150-175 in the Save Valley Conservancy, 59 in Gonarezhou National Park, 37 in Malilangwe and 400 animals in Bubye Valley Conservancy. The Mid Zambezi Valley comprising of Matusadonha and Mana Pools National Parks, Charara, Chewore and Sapi Safari Areas has a current population estimate of 600 lions (Zimbabwe Parks and Wildlife Management Authority Reports 2011). The current lion population estimates in the minor range areas are also significant.

Table 1: Lion Population Estimates (Bauer & Van Der Merwe, 2004, Chardonnet, 2002)

		Bauer & Van Der Merwe (2004)			Chardonnet (2002)		
Area	**Sq km's**	**Estimated population**	**Estimated minimum**	**Estimated maximum**	**Estimated population**	**Estimated minimum**	**Estimated maximum**
Charara Safari Area	2207	40	24	56			
Chete/Sijarira	1530	40	24	56			
Chewore Safari Area	2704	100	60	140			
Chirisa Safari Area	1788	60	24	56			
Chizarira National Park	1878	60	36	84			
Dande Safari Area	988	50	30	70			
Doma Safari Area	1933	35	21	49			

Gonarezhou/Save Chiredzi/Malilangwe/ Beitbridge/Tuli	5200	130	91	169	188	130	245
Hurungwe Safari Area	2606	80	48	112			
Hwange Ecosystem	25000	120	72	168	543	434	652
Matetsi Safari Area	10349	60	36	84	150	120	180
Mana Pools National Park	14400	97	83	112	495	396	594
Matusadona National Park	1392	120	90	150	310	248	372
Sapi Safari Area		40	24	56			
Zambezi National Park	865	25	15	35			
Totals	72 840	1057	678	1397	1686	1328	2043

6.0 POPULATION DENSITIES

Table 2 shows the current lion population estimates and densities in the Hwange-Matetsi ecosystem. The 12 year average density in the Hwange National Park is 2.8 lions per 100km^2 (2000-2011) with the population fluctuating over this time. This estimate is based on spoor transects and detailed population estimates and on individual recognition of animals in an intensively studied population.

Table 2: Results of lion population surveys of lions in the North West Matabeleland (Hwange Lion Research, 2014)

	Density	Area (km2)	Estimated number of lions	Year of survey
Hwange NP	3.75	14900	559	2013
Matetsi Units 1-5	3.04	1934	59	2008

Matetsi Units 6-7 and Zambezi NP	2.98	1585	47	2013
Ngamo & Sikumi Forest	0.45	1386	6	2008
Gwaai Conservancy	2.40	927	22	2007
Hwange Communal Land (Mvutu & Shana area)	0.61	392	2	2012
Tsholotsho buffer adjacent HNP	0.54	1275	7	2010-11
Chizarira NP	0.83	1948	16	2012
Chirisa SA	0.00	1713	0	2012
Matusadonha NP	2.17	1427	31	2013
TOTAL Lion Estimate			**750**	

The South Eastern Lowveld has a lion population density of about 6 lions per 100km^2 in the Save Valley Conservancy, 9 lions per 100 km^2 in Malilangwe and 0.8 lions per 100 km^2 in the Gonarezhou National Park (Zimbabwe Parks and Wildlife Management Authority Annual Report, 2013) (Figure 5).

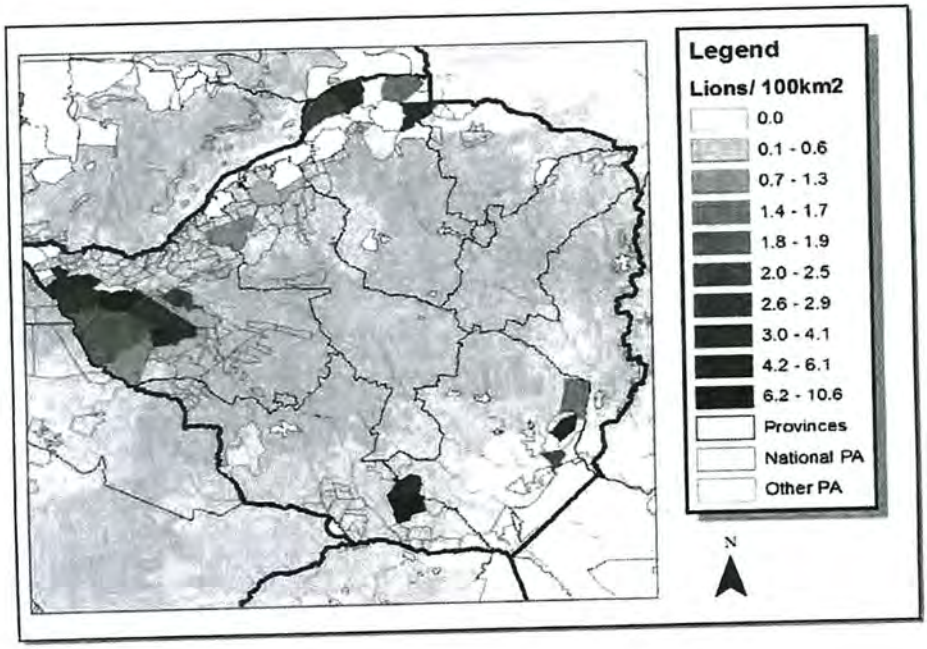


Figure 5: Lion densities in Zimbabwe (Leopard and Lion Spoor Survey Report, 2012).

The Matetsi-Kazuma-Zambezi complex to the North West of Hwange (4935km^2; composed of Deka and Matetsi Safari Areas, Kazuma and Zambezi National Parks and Kazuma and Pandamasuie Forests) is estimated to have a population of 222 lions based on a density of 4.5 lions per 100km^2. This estimate is extrapolated from a spoor survey of 1600km^2 area of the Matetsi-Kazuma-Zambezi complex in 2007. Table 3 shows lion population estimates and densities in selected survey sites in the Zambezi Valley and surrounding areas from the spoor survey done between 2011 and 2012. Table 4 shows the population estimates for Gonarezhou National Park in 2013.

Table 3: Population estimates and lion densities in selected survey sites in the Zambezi Valley (Hwange Lion Research, 2014)

Survey Site	Density/ 100km^2	Area (km^2)	Estimated number	Year of Survey
Omay	0.28	1865	5	2012
Chewore North	1.92	1648	32	2012
Dande	1.83	1155	21	2012
Hurungwe (Nyakasanga & Rifa)	1.89	1709	32	2011
Mana Pools	4.52	1287	58	2011
Hurungwe Mukwichi CAMPFIRE Area	0	1853	0	2011

Table 4: Population estimates from call up survey for Gonarezhou National Park (Lion Call Up Survey, 2013)

Parameter	Northern GNP	Southern GNP	Total
Area (km^2)	1665	2121	3786
Combined transect length (km)	229.8	301.8	531.6
Penetration ratio	1:7.25	1:7.03	1:7.12
Results			
Number of Individual lion spoor seen	22	5	27
Lion spoor frequency (km/spoor)	10.45	60.36	19.69
Spoor density (spoor/100km)	9.57	1.66	5.08
Density of lions per $100km^2$ (Y=0.3049X)	2.9	0.5	1.5
Estimated number of lions	48	11	59

7.0 POPULATION TRENDS

In Zimbabwe, trends in the population estimates of African lions show a growing

population trend. The average lion densities in most protected areas are also showing an increasing trend. For example in Gonarezhou National Park as shown in Table 5, an estimate of 24 lions was established in 2009 and by 2013 the population had grown by 150% to an estimated 60 individuals within a period of 4 years. Other areas within other protected areas with similar management regimes are also reflecting similar trends in population estimates.

Table 5: African Lion population estimates for Gonarezhou National Park (2009 to 2013) (Annual Report, 2013)

Species	2009	2010	2011	2012	2013
Lion	24	34	55	49	59

Bubye Valley Conservancy is a closed protected are system with a large resident lion population. Figure 6 shows the trend in lion population growth for the Conservancy from the time of introduction of lions into the property in 1999 to present. Bubye valley conservancy has the highest lion density of 14 lions per 100km^2.

Population trends of lions in Bubye Valley Conservancy

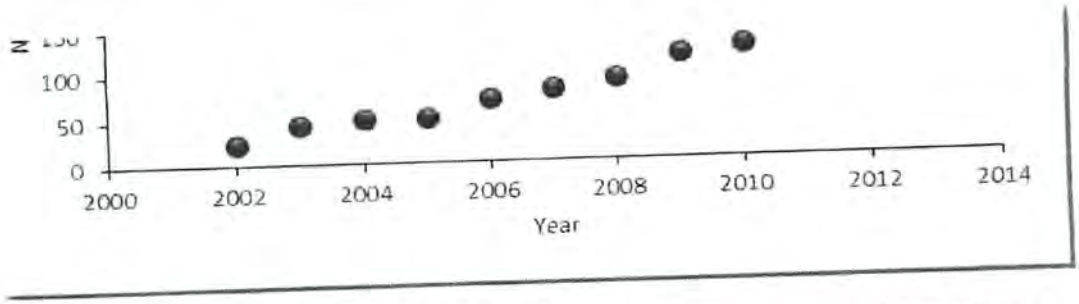


Figure 6: Trends in lion population for Bubye Valley Conservancy (Lion Report, 2014)

8.0 LEGAL UTILIZATION OF LIONS

8.1 Annual Trophy Quotas

Lions are used for consumptive and non-consumptive purposes. The main uses are trophy sport hunting, photographic safaris and educational purposes in captive breeding operations. Table 8 shows national annual lion trophy quotas for different broad land use types. The quotas set for trophy hunting are declining from 114 in 2004 to 89 in 2014 as part of adaptive management of the lions.

Table 8: National Annual Lion Trophy Quotas (ZPWMA Utilisation Unit, 2014)

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Parks	36	30	34	30	29	25	26	29	31	36	38
Communal	58	45	43	34	35	38	34	33	31	24	26
Forestry	9	8	3	3	3	3	3	4	4	4	4
Private	11	15	22	26	25	24	19	20	17	21	21
Totals	**114**	**98**	**102**	**93**	**92**	**90**	**82**	**86**	**83**	**85**	**89**

8.2 Quota Setting

African lions are one of the most sought after species by international hunting clients and are key for the viability of the trophy hunting industry. However, during recent years there has been increasing awareness of the negative impacts associated with lion hunting on lion populations in some areas, including in Zimbabwe. However, research has also demonstrated that lion hunting can be sustainable if quotas are established in a

scientific manner, and that lion populations are able to recover quickly from over-harvest if the pressure on them is removed.

8.2.1 The Quota Setting Process

For the African lion, a specific Hunt Return Form was introduced in 2013 hunting season. On this Hunt Return Form, key variables are recorded such as trophy quality, hunting success and hunting effort. Photos of all lion trophies are also included on the Hunt Return Form and are used to determine the age of the lion trophy. A Points System is being used to determine the 2015 Sport Hunting Quotas for African lions in Zimbabwe (Table 9)

Table 9: Proposed points system for lion age restrictions and quota setting in Zimbabwe

	≥6 years	No trophy	5 years	4-4.9 Years	<4 years	Failure to submit hunt return/incomplete hunt returns
For quotas of 3 or more	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Quota setting process	These points are added up and divided by 3 to yield the quota for next year					

The new Points System will restrict hunting to old males. Hunters are recommended to hunt mature males that are older than 5 years old. Latest scientific evidence suggests that if harvesting of lions is restricted to animals of 5-6 years or older, the impact of trophy hunting on the species population is likely to be minimal (Whitman et al. 2007).. By age 5 or 6, the lion has a chance to sire at least one litter. Restricting offtakes to older lions also increases the net number of lions that can be harvested over time.

In the Points System, operators would be penalized if they hunted animals less than 5 years old by not getting an approval for a lion quota on the same property for the

subsequent hunting season. If however, the operator hunts a lion older than 6 years, they would be rewarded through an increased quota of the same species in the subsequent hunting season.

Lion aging will be conducted through different aging characteristics including: the degree of facial scarring; teeth colour and degree of wear; mane development (particularly regarding the shape around the ear and the mohawk); and through post mortem analysis of the width of the pulp cavity of the second premolar (which becomes narrower with age).

Field-based training on aging techniques has already been conducted for the Zimbabwe Parks and Wildlife Management Authority and Safari Operators. Specialized training manuals including Field Guides have also been developed.

8.2.2 Monitoring of quota utilization and trade data

- Approved quota are issued to local authority/landowner
- Quotas are utilized by contracted Safari Operators
- Monitoring at the local level is carried out by community game guards and wildlife monitors
- The Zimbabwe Parks and Wildlife Authority undertakes monitoring programmes at the national level including monitoring of biological and trade information on the species, environmental and other data. The Authority also ensures compliance with wildlife laws and regulations.
- A Hunt Return Form is completed for each hunt by the safari operator and local authority and is submitted to the Zimbabwe Parks and Wildlife Management Authority,
- The Hunt Return Form allows key variables to be captured for input into national database and provides further datasets for subsequent quota setting exercises

9.0 ILLEGAL TRADE IN LIONS AND THEIR PRODUCTS

Illegal trade in lions and their products is very insignificant. There are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. Anyone found in possession of illegally acquired lion specimens pays a fine of USD5000 or faces a mandatory jail sentence. In On conviction for lion poaching, courts may ask the convict to pay compensation fee of US**$20 000.** Some illegal off takes occur when lions are accidentally killed through snares or chemical poisoning meant for herbivores. Other cases involve retaliatory killing of lions as a result of livestock predation outside protected areas.

10.0 HUMAN AND LION CONFLICT MANAGEMENT

The lion is a flagship species and powerful symbol of Africa, and yet living with lions poses hardships for many communities. In some areas, the lion is a major predator on domestic livestock, leading to profound conflicts with local herders.

Table 10 Human and Lion Conflict (2009 to 2011) (CAMPFIRE Association, 2012)

District	Total incidents	People Injured	People Killed	Livestock killed
Hurungwe	5	2	2	1
Chiredzi	25	0	0	136
Mbire	5	0	5	7
Binga	9	0	0	39
Total	**44**	**2**	7	**183**

11.0 MANAGEMENT INITIATIVES AND CONTROL MEASURES WITH REGARD TO LION CONSERVATION

11.1 Conservation strategy and action plan for the lion (*Panthera leo*) in Zimbabwe

Zimbabwe is one of the few lion range states in Africa, where large areas of land which have been set aside as protected areas, still have viable lion populations. In some parts of Africa, lions have been completely wiped out through uncontrolled hunting, revenge killings, habitat loss and other factors with the only record to indicate their existence in the past now left as anecdotal evidence. The conflict with local communities and the threat to livestock and human lives in many parts of the world including Zimbabwe is well documented. While its attraction in ecotourism as one of the most beautiful and graceful cats, and as a trophy animal in sport hunting, its economic benefits are huge. Its social and cultural values are an integral part of the Zimbabwean lifestyle, therefore efforts to ensure lion conservation need to be strengthened.

The Zimbabwe Conservation Strategy and Action Plan for the Lion will guide the conservation and management of this important top predator. The strategy and action plan is the outcome of a workshop in which stakeholders representing the wildlife industry, technocrats, inter and non-governmental organizations, wildlife producers etc, actively participated.

11. 2 Law enforcement efforts being implemented in Zimbabwe with regard to lion conservation

- Intensive anti-poaching efforts by Parks rangers throughout the country.
- Joint investigative operations based on intelligence between the Zimbabwe Parks and Wildlife Management Authority other law-enforcement agencies like the police and the army.
- Joint Field Anti-poaching by the Zimbabwe Republic Police and Parks Rangers on Private game farms and Conservancies and on Stateland.

- Border Control – Trade compliance officers at ports of exit and entry who monitor and enforce compliance together with Customs Officials, Immigration and the Zimbabwe Republic Police.
- Information led deployment
- Problem animal control by Zimbabwe Parks and Wildlife Management Authority- Management Division (Anti poaching Rangers) in the communal areas and Natural Resource Monitors in Rural District Councils
- Harvesting controls: sustainable quotas, hunting permits and hunt monitoring and Tourism Return Forms (TR2).
- Trade controls: Issuing of CITES Export and Import Permits following recommendations based on non-detriment findings by the Scientific Authority.

12.0 LEGAL FRAMEWORK GOVERNING LION CONSERVATION

Zimbabwe's National Legislation is very comprehensive to ensure long term survival of the African Lion. Zimbabwe has a full range of national legislative and administrative measures needed to effectively implement all aspects of the Convention on Trade In Endangered Species of wild flora and fauna (CITES) and related Resolutions and Decisions of the Conference of Parties. Zimbabwe's legislation is in Category 1 of CITES and therefore meets all the requirements of CITES implementation.

The African Lion is a specially protected species whose conservation is regulated through a policy and legal framework and regulations which include:

- Parks and Wildlife Act; Chapter 20:14 (1996) as amended in 2001
- Environmental Management Act; Chapter 20:27
- Forest Act; Chapter 19:05
- Statutory Instrument 362 of 1990 : Parks and Wildlife (General) Regulations, 1990

- Statutory Instrument 76 of 1998 :Import and Export of Wildlife Products
- Statutory Instrument 40 of 1994 : Parks and Wildlife Act (General) Amendments
- Statutory Instrument 26 of 1998: Parks & Wildlife Act (General) Amendment
- Statutory Instrument 92 of 2009; Compensation Values for Wildlife
- Statutory Instrument 93 of 2009; Compensation Values for Trapping of Animals
- Trapping of Animals Control Act 20.16
- Licensing and Protection of wildlife properties
- Conservation Strategy and Action Plan for Lion (*Panthera leo*) in Zimbabwe (2006). Prepared following a Workshop. 30-31 October 2006. Harare.
- Tourism Hunt Return Forms (TR2)
- Code of Ethics for Hunting in Zimbabwe

Parks and Wild Life Act Chapter 20:14 of 1996 as amended in 2001

It is the Principal legislation which governs and regulates the purchasing, selling and exporting of parts and derivates including live animals. It also protects the gazetted protected areas which form the major range and habitat for the African lion.

The Act prohibits the hunting of any animal and removal of parts of animals from any land without authority. The Act provides for the protection of animals in the following designated areas, National Parks, Parks and Wild life Estates, Parks and Wild life land, Sanctuaries and Safari Areas.

The Act further provides for categorization of animals into protected and specially protected animals. Of particular interest to lion conservation is Part XII of the Act which prohibits the hunting, removal and sale of live animals and animal products from designated national parks.

The Act has the following provisions which address issues related to Control of live animals, trophies and trade;

- Section 59 provides for the general protection of all wildlife which is not covered by the above categories.

This Act empowers the Minister responsible for the Parks and Wild Life to issue regulations governing certain activities such as-:

- Section 60 where the Minister may prohibit or restrict hunting and removal of animals in defined areas.
- Section 66 provides for the licensing of professional hunters who undertake legalized hunting safaris.
- Section 72 provides for the sale of animals born or hatched and held in captivity.
- Section 73 provides for the sale and manufacture of articles from trophies.

Environmental Management Act Chapter 20:27 Of 2006

This Act provides for the sustainable management of natural resources and protection of the environment. The Act also provides for the preparation of National Environmental Plans for the management and protection of the environment in Zimbabwe.

Forest Act Chapter 19:05

This Act provides for the establishment of a commission, to control, manage and protect of State forests as well as private forests thus providing a secure habitat for lions and other wildlife species.

Statutory Instrument 362 Of 1990
This legislation provides in sections 66-75 for the Regulation of Manufacture, Processing and Dealing in trophies.

Statutory Instrument 76 Of 1998
Statutory Instrument number 76 of 1998, Parks and Wild Life (Import and Export) (Wild Life) Regulations specifically deals with Import and Export of wildlife products. This legislation was enacted to ensure compliance with CITES requirements for export and import of wild flora and fauna. These provide for the following-:

- Section 3 deals with the Control of Import and Export of wild life and trophies.

The above section lays down a general prohibition on the import into or export from Zimbabwe of any "wild life" or trophy of "wild life" except in accordance with either a certificate issued in terms of section 5 by the Director or Director of Customs, or an open general permit:

- Section 5 deals with Permits and Certificates and is consistent with CITES legislation.

- Section 15 deals with Offences and Penalties.

Any person who contravenes any of the provisions of subsection 1 shall be guilty of an offence, and liable to a fine or imprisonment. To effectively ensure compliance, the Zimbabwe Parks and Wildlife Management Authority deployed a permanent team of officers based at all ports of exit and entry to assist border control officials in monitoring and inspection of all wildlife exports.

Statutory Instrument 26 Of 1998
The regulations provides for the monitoring of all hunting activities in the country to ensure compliance by all Safari Operators and international clients and to ensure that the TR2 Form. (Tourism Hunting Return Form) is duly completed.

Trapping Of Animals (Control) Act Chapter 20:21
The Act provides for the control, restriction and regulation of the construction, possession and use of certain traps for the purpose of trapping animals; to control the sale and disposal of certain animals, to include lions and to provide for matters incidental to or connected with the foregoing.

Statutory Instrument 92 Of 1992
Parks and Wild Life (Payment for Hunting of Animals and Fish) Notice, 2009
This instrument provides for compensation values of various wildlife forms to include animals and fish. It acts as an additional deterrent measure in matters where poaching cases are being dealt with in accordance with the law. The compensation value for illegal hunting of lion is USD 5 000, 00.

Statutory Instrument 93 Of 2009
Parks and Wild Life (Payment for Trapping of Wild Animals) Notice, 2009
This instrument provides for the payment of compensation to the state or game owners in the event that one is convicted for illegally trapping wild animals on various land categories. The compensation value for illegal hunting of lion is USD 5 000, 00.

Statutory Instrument 40 Of 1994
Parks and Wildlife (Appropriate Authorities for Communal Land) Notice, 1994, resulted in the according of Appropriate Authority status to various Rural District Councils. This legislation devolved authority to Rural District Councils and gave rights to local communities to sustainable utilize wildlife and other natural resources in their areas of jurisdiction.

New Draft Statutory Instrument
A draft Statutory Instrument, Parks and Wildlife (Inspection, Registration and Licensing of Wildlife Properties) Regulations is currently under consideration in the Office of The Attorney General. This legislation will assist the Zimbabwe Parks Management Authority to adequately monitor the activities of private property owners whose premises have wildlife.

Code of Hunting Ethics for Zimbabwe

A Code of Ethics for Hunting in Zimbabwe is in place which regulates all forms of hunting including all lion hunts.

REFERENCES

Bauer, H and Van Der Merwe, S 2004. Inventory of free ranging lion *Panthera leo* in Africa. *Oryx* 38(1), 26-31

Chardonnet, Ph (ed) 2002. Conservation of the African lion. Contribution to a status survey. International Foundation for the Care of Wildlife, France, conservation force, USA, 177pp

Conservation Strategy and Action plan for the Lion (*Panthera leo*) In Zimbabwe – Prepared following a workshop 30-31 October 2006, Harare.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Save Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Grinnell, J., Packer, C. & Pusey, A. E. 1995. Cooperation in male lions: kinship, reciprocity or mutualism? Animal Behaviour, 49, 95–105.

Groom R. J, Funston P.J, & Mandisodza R (2014) Surveys f Lions (*Panthera leo*) in Zimbabwe yielding disturbing results: What is driving the population collapse? Fauna And Flora International, Oryx, 1 of 9

McComb, K., Packer, C.&Pusey, A. (1994). Roaring and numerical assessment in contests between groups of female lions. Anim. Behav. 47: 379–387.

Packer, C., Scheel, D. & Pusey, A. E. 1990. Why lions form groups: food is not enough. American Naturalist, 121, 716–728.

Pusey, A. E. & Packer, C. (1987). The evolution of sex-biased dispersal in lions. Behavior 101: 275–310.

Pusey, A. E. & Packer, C. (1987). The evolution of sex-biased dispersal in lions. Behavior 101: 275–310.

Stander, P.E. (1998). Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. J. Appl. Ecol. 35, 378–385.

Whitman K & Packer C (1997). The effect of sport hunting on social organisation of the African lion (*Panthera leo*). Proceedings of a symposium on lions and leopards as game ranch animals. Onderstepoort, October 1997.

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

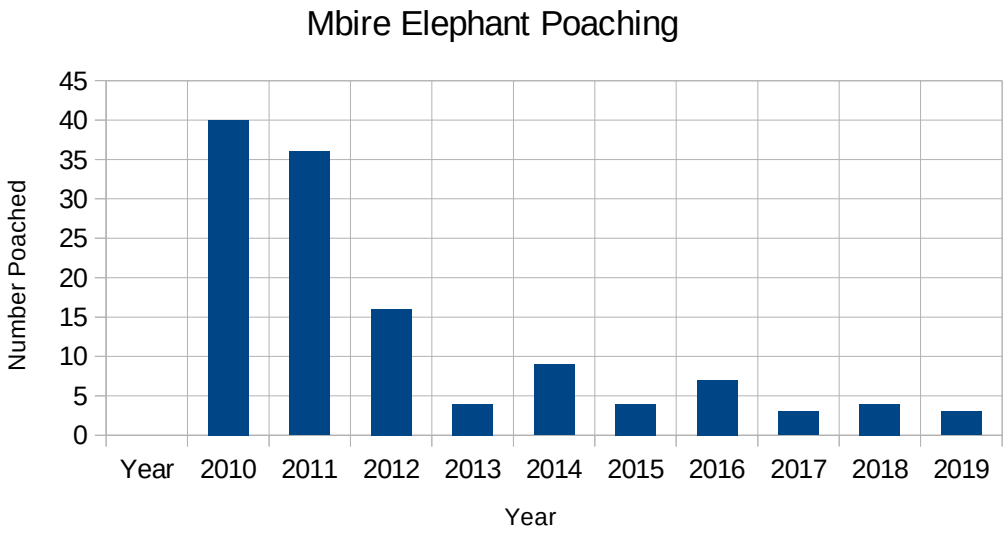

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

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April 21, 2020

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 12:41:47 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 11:59:06 -04'00'

To: Permit File PRT- 16345D

Enhancement Finding

Applicant: Francescomaria Tiberio Cavallo (PRT–16345D)

Introduction

Francescomaria Tiberia Cavallo submitted an application on November 19, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken on September 16, 2018, from the Savé Valley Conservancy (SVC), Humani Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Francescomaria Tiberio Cavallo hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Cavallo's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Cavallo himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Savé Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Cavallo's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Cavallo supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Cavallo, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Cavallo in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Cavallo's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Cavallo's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Cavallo's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Cavallo, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Cavallo's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Cavallo submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Cavallo plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Cavallo's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Cavallo's permit request, we find that the expertise, facilities, or other resources available to Mr. Cavallo appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Cavallo's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Cavallo's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Cavallo on September 16, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Francescomaria Tiberio Cavallo of El Campo, Texas.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / jan/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6) [redacted]

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:16:36 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 16345D, Francescomaria Tiberio Cavallo, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 12:43:19 -04'00'

Signature: _____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA16345D-0
Effective: 08/14/2020 Expires: 08/13/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.14 08:05:07 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
FRANCESCOMARIA TIBERIO CAVALLO
(b) (6)
EL CAMPO, TX 77437
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Schnetzler	Christopher	R	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Powell	Ohio	43065	Delaware	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 01/17/2019

Signature of applicant/principal officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Amy Wicklund Phone (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo leo

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Country-Zimbabwe, Province-Masvingo, Conservancy-Save Valley Conservancy, Area-Humani Ranch, coordinate where lion was harvested- 36k 143 280, Nearest City- Chiredzi

   b. Date wildlife was hunted:

10-12-2018 through 10-27-2018 Lion was harvested on 10-19-2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Name of Safaris Outfitter- Tredelk Safaris Name of Safaris Company- Tredelk Safaris. Name of professional hunter - Guy Whittall- Professional hunter number 421

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Consultants International 4 Josiah Chinamano Road Belmont Bulawayo Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). See attached.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
City:	Belmont
State/Province:	Bulawayo Zimbabwe
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see information included with application

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Please see information included with application

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see information included with application

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) _____ Date: 01/17/2019

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Please use New York, NY Port

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 9 October 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Tredelk Safaris who have applied for a permit to hunt 1 x lion with client **Chris Schnetzler** in the following property:

- Humani and Bedford in Save Valley Conservancy Masvingo Province

The hunt will be **from 12 October 2018 to 26 October 2018**under the guidance of professional hunter G. Whittal PH license number 421.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~ 9/10/18

Investigation and Security Manager **Date**

Approved/ Not ~~Approved~~: 10/10/18

Head Management Services **Date**

For and on behalf of the Director General

Question 9b

9 b.

- The trophy fee on the lion is US$15,000.00 of this US$5,000.00 is paid to Zimbabwe Parks an Wildlife Authority.
- The operator (Tredelk Safaris) pays Zimbabwe Parks and Wildlife Authority the gazetted license fees for all trophies hunted.
- The operator (Tredelk Safaris) pay a further 15% of the government gazetted trophy license fees to the Zimbabwe Parks and Wildlife Authority.
- The operator bought the Humani on the Auction in december of 2014 for 5 years with the option of renewing for another 5 years. The sale of the auction is paid to Zimbabwe Parks an Wildlife Authority.
- The Zimbabwe Parks and Wildlife authority are responsible for the welfare of the community through license fees,15% of the annual quota allocated and the Auction price paid by the operator.
- The operator is then responsible for all the anti poaching, water management and wildlife management.

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081272
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Tredelk Trading (Pvt) Ltd	Client's Full Name	Chris Schnetzler
ZTA (HOP) No.	HOP0304	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	11 Hazeldene Road Borrowdale Harare	Address	(b) (6) Powell ,Ohio
Name of Professional Hunter	G WHITTAL	Licence No.	421
Telephone		Fax	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	Address	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Humani	Masvingo	
2	Mkwasine Cent Ext	Masvingo	
3	Bedford	Masvingo	
4	Senuko 2	Masvingo	
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	12-10-2018
Date of Safari To	26-10-2018
Daily Rate Charged For Big Game USD	1,400.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	21,379.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	18,950.00
Other fees (Incidentals)	1,230.00	Grand Total USD	41,559.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Humani	36k143280	20-OCT-2018	24 7/8"	15,000
2	GIRAFFE	M	Killed	Humani	36K383895	14-OCT-2018		1,500
3	GIRAFFE	M	Killed	Humani	36K497538	12-OCT-2018		1,500
4	HYENA	M	Killed	Humani	36k175425	21-OCT-2018		850
5	IMPALA	M	Killed	Humani	36K339142	16-OCT-2018	48"	100
6								
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Lion Hunting in Zimbabwe's Savé Valley Conservancy
A Conservation Success Story

Dr Rosemary Groom
African Wildlife Conservation Fund

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, proposals were drawn up to form what would have been known as the Savé Valley Intensive Conservation Area (du Toit 1989). The initial focus of the proposal was to create a single large wildlife area, especially for the re-establishment of endangered species and species that had been overexploited in the past. Cattle ranching would still remain the primary land use option with wildlife an additional source of income.

The formation of the Savé Valley Conservancy came in June 1991 with the signing of the first constitution by the various members. However, the following 1991/1992 rainy season proved to be the driest season ever recorded, and proved to be a deciding factor for the landowners of the Savé Valley Conservancy with regards to future land use. At a workshop held in November 1992 a decision was taken that wildlife would be the primary land use option and that all cattle still owned within the conservancy would be disposed of. This created what was at the time the largest private wildlife conservancy in the world, with 340 839 hectares included (Fig 1).

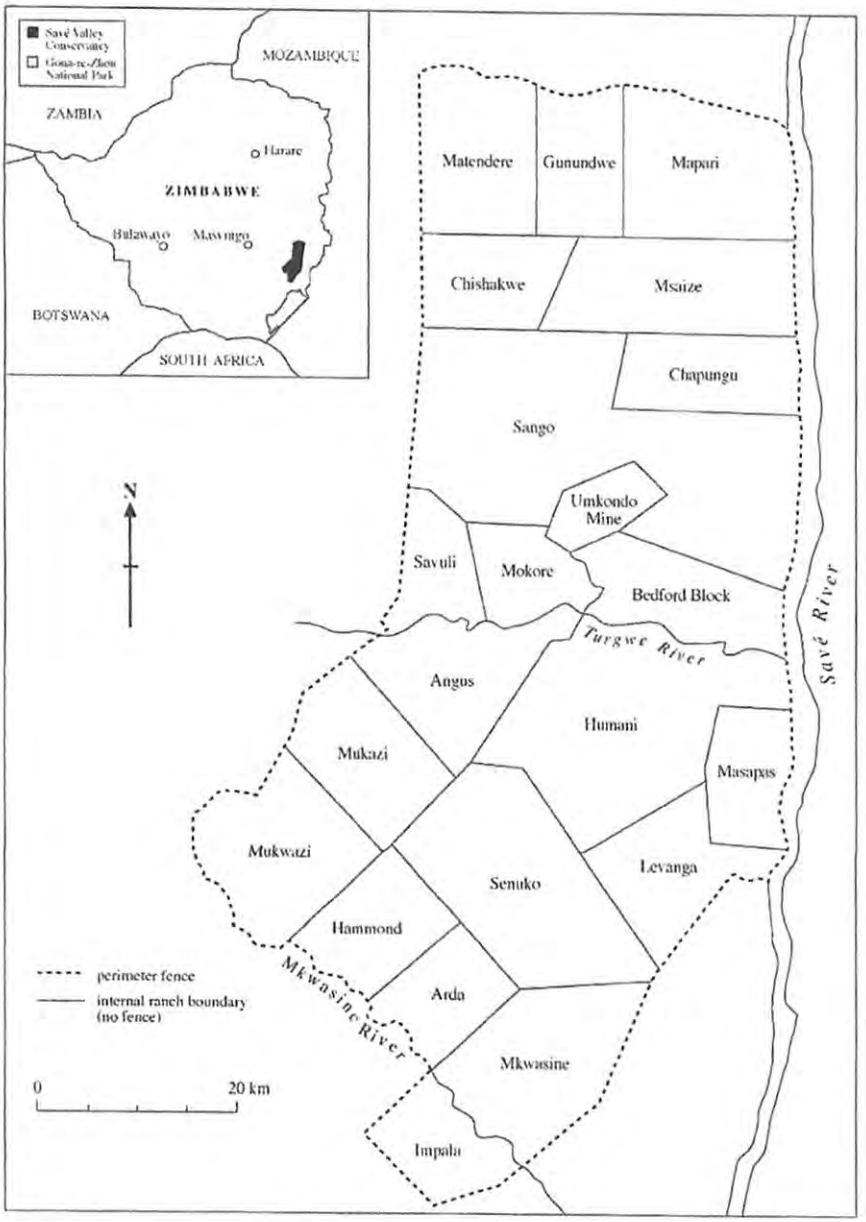


Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members were then faced with the challenge of rebuilding the wildlife population, removal of all internal fencing, the erection of a common perimeter fence and security. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Some wildlife species had been translocated into the conservancy prior to 1991 (including black rhino, elephant, sable, eland, nyala, giraffe, waterbuck, wildebeest and zebra; Table 1). Species relocated into the SVC since signing the constitution in June 1991 include more black rhino, buffalo, elephant, eland, giraffe, nyala, sable antelope, spotted hyena, tsessebe, Lichtenstein's hartebeest, warthog, waterbuck, blue wildebeest, zebra and lion (Table 1).

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	**Total**
African buffalo (*Syncerus caffer*)	91	88	253	40	**472**
African elephant (*Loxodonta africana*)	624	-	-	-	**624**
Black rhinoceros (*Diceros bicornis*)	-	31	-	-	**31**
Blue wildebeest (*Connochaetes taurinus*)	223	525	49	-	**797**
Burchell's zebra (*Equus burchellii*)	17	309	66	-	**392**
Giraffe (*Giraffa camelopardalis*)	36	101	44	-	**181**
Lichtenstein's hartebeest (*Alcelaphus lichtensteinii*)	-	-	-	28	**28**
Livingston's eland (*Tragelaphus oryx*)	215	263	102	-	**580**
Nyala (*Tragelaphus angasii*)	22	43	11	26	**102**
Lion (*Panthera leo*)	-	**3**	-	**10**	**13**
Spotted hyena (*Crocuta crocuta*)	-	-	-	3	**3**
Ostrich (*Struthio camelis*)	-	-	71	-	**71**
Sable antelope (*Hippotragus niger*)	49	203	122	-	**374**
Tsessebe (*Damaliscus lunatus*)	-	97	-	-	**97**
Warthog (*Phacochoerus aethiopicus*)	-	207	-	-	**207**
Waterbuck (*Kobus ellipsiprymnus*)	177	66	82	32	**357**
White rhinoceros (*Cerathotherium simum*)	-	-	-	20	**20**
TOTAL					**4349**

3 Trophy hunting vs Ecotourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, continue the re-stocking and increase the security, especially due to the now significant numbers of black rhino in the conservancy. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

3.1 The Land Reform Program

The land reform program was launched in February 2000 and created negative press from the international community. This resulted in travel bans and warnings from most of Zimbabwe's source markets, which, compounded by the negative publicity in the media, resulted in major suppliers withdrawing their support. In the case of the Senuko Lodge, this resulted in a 98% cancelation of the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snaring (bushmeat poaching) was extreme. For example, in the following eight year

period (2001 to 2009), 10,520 illegal hunting incidences were recorded in the conservancy, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al 2011).

The associated political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC.

4 Lions in the Savé Valley Conservancy

As mentioned, lions, and all other large predators were virtually or completely eradicated during the cattle ranching era (du Toit 1994, Pole 1999). Once persecution stopped, lion numbers began to pick up, but initial recovery was slow, probably because of a depleted source population. Evidence of lions were first noticed in the late 1990s / early 2000s, but were almost exclusively of males. Very few signs of females were observed until 2003, when small family groups and male-female pairs were observed. By 2004-5 there were some reports of cubs. Population recovery has been largely through natural recolonisation, although 13 lions were reintroduced between 1993 and 2005.

In 1993, three lions were brought into the conservancy by Humani Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Lions have been monitored in the Savé Valley Conservancy since 1999 when the first survey was conducted (Pole 1999). Track index or call-up surveys were then conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Results of the surveys indicate that the lion population in the Savé Valley Conservancy has been undergoing exponential population increase (Figure 1; Groom 2012). Using prey availability models (Hayward et al 2007), it was calculated that the population in 2011 was only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless controlled.

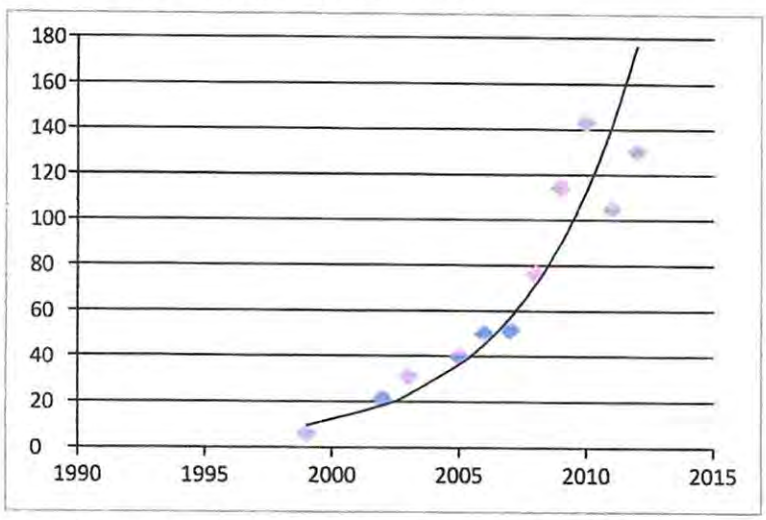


Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012).
Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional, scientific lion management plan was commissioned by the conservancy in 2011 (Funston 2011; Appendix 1). The aim of the plan was to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool, based on the evidence of good hunting practice in the conservancy. It demonstrates willingness by the conservancy to guide their hunting policy based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100%	100%	100%	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy in recent years. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. $2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of $10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US $1,365,000 in bed nights and $260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. $375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

Lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed investment of c. US$ 136.000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). An additional US$ @@@ was spent by members on a central anti-poaching unit for the battle against rhino poaching. A removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs and especially black rhinos (an IUCN Key 1 population).

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

5.1 The impact on neighbouring communities

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US$85,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Recently the conservancy has signed a deal with the chiefs of all the neighbouring wards.....

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers. The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

7 References

Bond, I. (1993) The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe

Child, B (1988) The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. DPhil Thesis, University of Oxford, Oxford, UK

Cumming, D.H.M (1993) Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Funston, P.J. (2011) The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy

Groom, R.J. (2012) Carnivore densities in the Savé Valley Conservancy: 2012. Report for the Savé Valley Conservancy

Hayward, M.W., O'brein, J. & Kerley, G.I.H. (2007) Carrying capacity of large African predators: predictions and tests. Biological Conservation, **139**, 219-229

Jansen, D.J., Child, B. & Bond, I. (1992) Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe

Lindsey, P., du Toit, R., Pole, A. & Romanach, S. (2008) Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

Lindsey, P., Romanach, S., Tambling, C., Chartier, K. & Groom, R.J. (2011) Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx, **45**, 96-111

Pole, A. (1999) The behaviour and ecology of African wild dogs, *Lycaon pictus*, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland

du Toit, R. (1989)

du Toit, R. (1994) The Savé Valley Conservancy. In: The Lowveld Conservancies: New opportunities for productive and sustainable land use, pp. 28-36: Price Waterhouse Wildlife, Tourism and Environmental Consulting, Zimbabwe

Carnivore Densities in the Savé Valley Conservancy

Results of the 2018 Spoor Survey & Wild Dog Monitoring Project

Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

(Spoor survey carried out by Amy Wolton, Rueben Boté, and Douglas Tomwe)

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of carnivores within the Savé Valley Conservancy (SVC / the conservancy) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer.

Spoor surveys have been shown to be an effective and efficient means to assess wildlife densities (Stander 1998; Funston et al. 2001; Davidson & Romañach 2007; Funston et al 2010) with strong correlations existing between spoor density and true density. The technique is considered to produce reliable estimates for lions, spotted hyenas, and leopards, when sample sizes (spoor encounter rates) are sufficient. Other carnivores are included in our counts simply to monitor trends over time.

This report presents the results of the October 2018 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.

Methodology

The 2018 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of

sample area, 1km of transect was surveyed, creating a penetration density (expressed as a ratio of kilometres of transect surveyed to total sample area) of between 1:6 and 1:7.

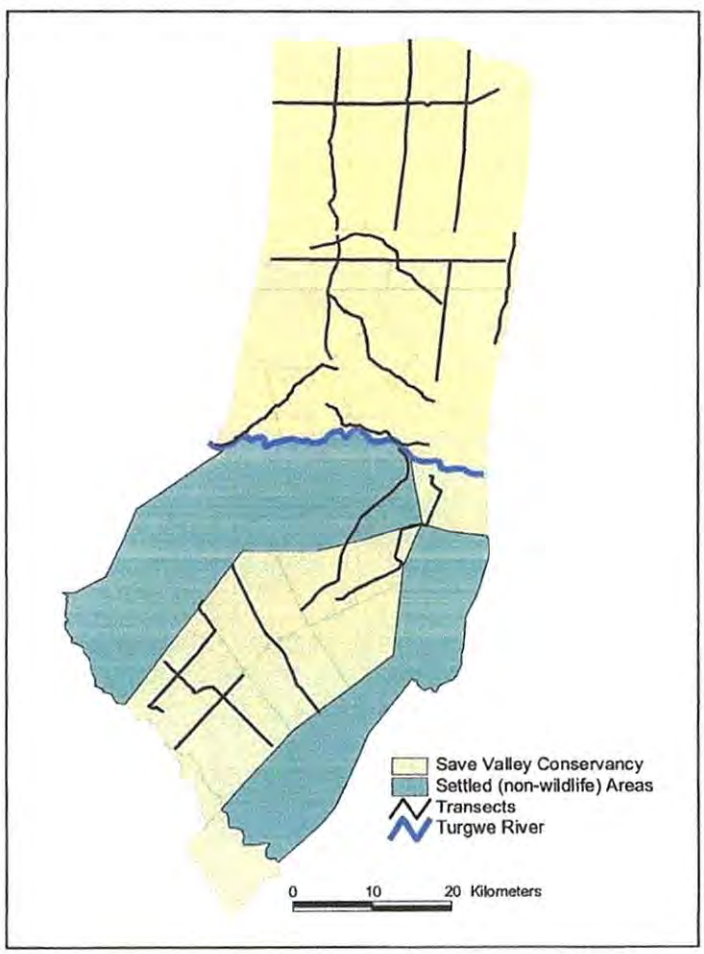
The total area of the Savé Valley Conservancy is 3,490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2,439km^2; 1,639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.5 km, giving a penetration ratio of 6.32. In southern SVC, the combined transect length was 130.9 km, giving a penetration ratio of 6.12. For the conservancy as a whole, 390.4 km were driven (penetration ratio 6.25).

Transects surveyed were the same as those used in 2007-2017 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Boté, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.6 km and 29.1 km in length, with a mean transect length of 21.7 km.

Each transect survey started as close to sunrise as possible, and wherever feasible was driven from west to east to ensure the best possible tracking conditions. Only tracks less than 24 hours old were counted. Road conditions are generally sandy, such that spoor is relatively easy to see. Where possible, spoor of individual animals were followed to reduce the likelihood of that individual being counted twice on a given transect. Spoor was recorded for all mammalian carnivores bigger than a genet.

Figure 1. Map of the transects driven – October 2018



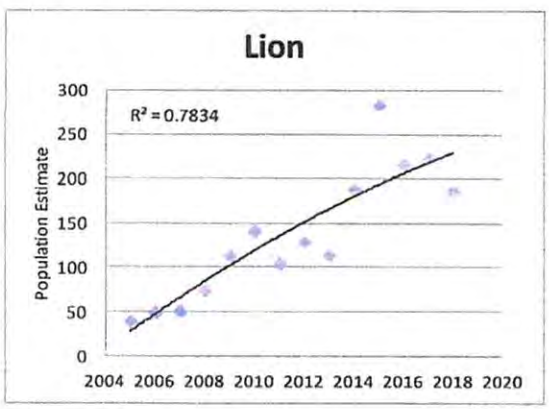
Results

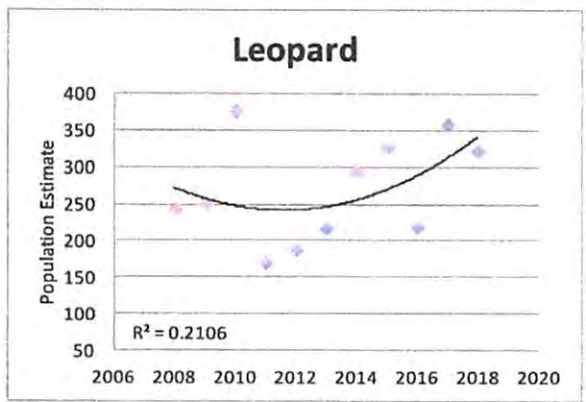
Table 1: Summary of survey parameters (2018)

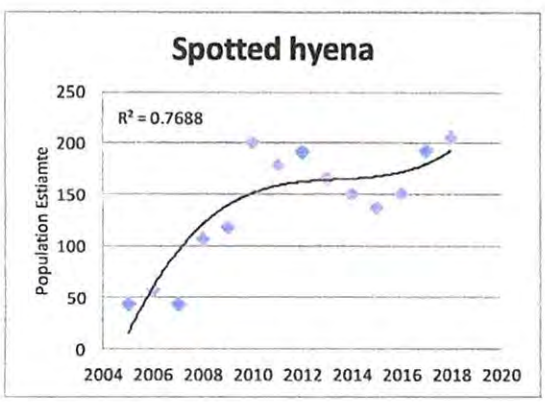
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	259.5	130.9	390.4
Penetration ratio	6.32	6.12	6.25

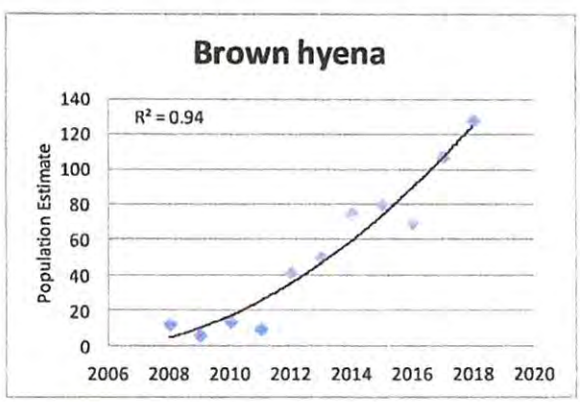
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2018 (from 2005-2018 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs only).

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223	187
Leopard				245	252	378	172	189	218	295	328	221	359	323
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193	206
Brown hyena				12	6	14	10	41	50	75	80	70	107	128
African Wild dog				45	60	64	61	86	90	81	91	99	94	96
Black backed jackal				188	190	157	141	151	199	229	241	234	296	153









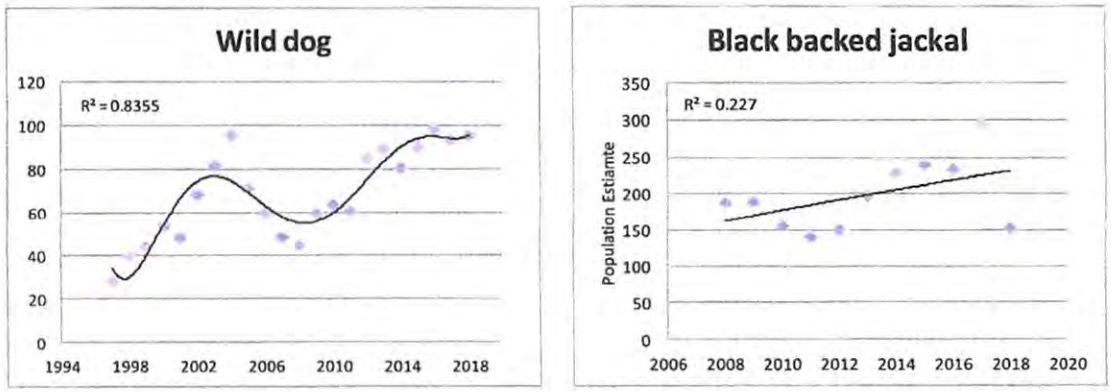


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

The results show a slight drop in lion and leopard numbers, and a significant decline in black backed jackals (currently unclear as to whether this represents a genuine decline or simply a low count). The spotted and brown hyenas, and wild dog population, remain stable and/or increasing.

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to have been relatively stable since 2014, with a few natural fluctuations. Despite the slight decrease in estimated individuals since last year, the population **estimate of 187 lions** in 2018 is within range of the long-term population trend (Figure 2).

The number of lions in SVC equates to a **density of 7.7 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 98 lion tracks we encountered, 22% were adult males, with 65% identified as adult females, 6% as young cubs, and 7% of tracts were unidentified. With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

In 2018 there were an estimated **323 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2011 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a positive trend (Figure 2).

Leopards are at a **density of 13.3 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in other places, for example in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (8.1 / 100km²; Groom & Watermeyer 2018). Finally, the SVC leopard population appears to display a 2:1 ratio skewed in the favour

of females. Of the 74 leopard tracks we recorded, 62% were adult females and 30% were adult males. No cub tracts were recorded (0%) and 8% of the tracts were unidentified.

Derivation of population estimates from spoor densities is controversial for leopards (there are several different equations available which give different numbers) so the numbers themselves should be treated with caution. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. Indeed, there were an estimated **206 spotted hyenas** in 2018. The hyena population could be doing better in light of the recently stabilising lion numbers, but we will need to monitor the population to determine if a true trend is emerging.

Spotted hyenas are at a density of **8.4 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 10.4 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2018). Given the relatively lower density of the species in the conservancy, they may still increase more (especially if the lion numbers continue to drop).

There were an estimated **128 brown hyenas** in the conservancy in 2018. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **5.2 brown hyenas / 100km²** in 2018 which is higher than the average (3.4 brown hyenas / 100km²) over the last few years (2014-2017).

As reported consistently for the past few years, the **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 96 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km²)**. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 278 wild dogs in the conservancy, with a density of 11.4 African wild dogs / 100km². This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

When counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time. Nonetheless, their population has been relatively stable since 2011.

There has been a significant decrease in the **black backed jackal** population estimate for the conservancy. At an estimated **153 black backed jackals** in 2018, this is the lowest count of the species since 2013. Whether this is a true decline or not is unclear. At this stage, however, we are cautiously treating the 2018 count as an anomaly, but this species will need to be watched very closely. The estimated density of jackals was **6.3 jackals / 100km²** in 2018.

We once again stress, that the spoor encounter rate for **cheetah** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetah, even with large confidence intervals. Indeed, **we did not pick up a signal track for cheetah in the 2018 spoor survey**. Although we know that there are resident cheetah in the conservancy, we can safely say the population is still very low (zero cheetah tracks were seen in the 390.4 km of transects driven in 2018). However, spoor surveys are not appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. **The Cheetah Conservation Project Zimbabwe, which collected updated photographic information on cheetah throughout Zimbabwe, estimated c. 12 adult cheetahs in SVC in 2015 (van der Meer, 2016).** We have no reason to think this number has changed much.

Word of caution

When interpreting the results in the graphs and tables at the end, please do so with caution, especially to quote specific numbers. For lions and hyenas we are confident that these spoor surveys are relatively accurate in the numbers they predict, although occasional anomalous over and undercounts need to be treated carefully. Likewise, we can trust the numbers for wild dogs, as they are from AWCF's detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give different population estimates from each other. The spoor survey technique has not been calibrated for species like jackals, civets, even brown hyenas, so while the data is useful for looking at trends, using population figures directly from the graphs for these species is unadvisable.

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

Acknowledgements

Permission to conduct this research was given by the Research Council of Zimbabwe, and the Savé Valley Conservancy, with the support of the Zimbabwe Parks and Wildlife Management Authority. Thank you to Chishakwe Ranch for hosting the project team and for providing logistical support. Thanks also to all of the landowners and managers in the conservancy for allowing us to conduct this spoor survey on their properties. Rueben Bote deserves special mention for his excellent track identification.

Appendix 1: All Spoor Survey Results for All Species Counted (2018)

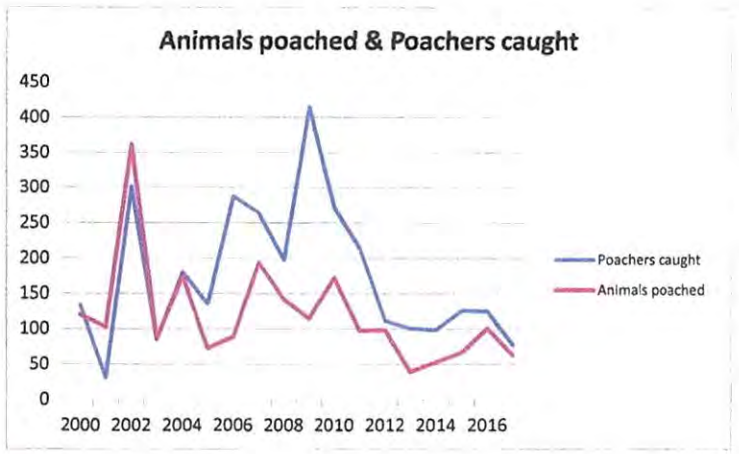
NORTH SVC Species	Survey North SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100kr
Black-backed	1639	83.9186948	Leopard	5.120115607	259.5	19	13.65789474	259.5	6.315992293	7.32177264
Brown hyaena	1639	96.2873025	Lion (Y=0.3049X)	5.874759152	259.5	50	5.19	259.5	6.315992293	19.26782274
Cheetah	1639	0	Lion (Y=0.3049X)	0	259.5	0	0	259.5	6.315992293	0
Civet	1639	777.3521202	Leopard	47.42843931	259.5	176	1.474431818	259.5	6.315992293	67.82273603
Honey badger	1639	70.66837457	Leopard	4.311676301	259.5	16	16.21875	259.5	6.315992293	6.165703276
Leopard	1639	260.5896312	Leopard	15.89930636	259.5	59	4.398305085	259.5	6.315992293	22.73603083
Lion	1639	138.6537156	Lion (Y=0.3049X)	8.459653179	259.5	72	3.604166667	259.5	6.315992293	27.74566474
Spotted hyaena	1639	125.1734933	Lion (Y=0.3049X)	7.637186898	259.5	65	3.992307692	259.5	6.315992293	25.04816956
Wild dog	1639	215.6835576	Lion (Y=0.3049X)	13.1594605	259.5	112	2.316964286	259.5	6.315992293	43.15992293
African wildcat	1639	30.91741387	Leopard	1.886358382	259.5	7	37.07142857	259.5	6.315992293	2.697495183

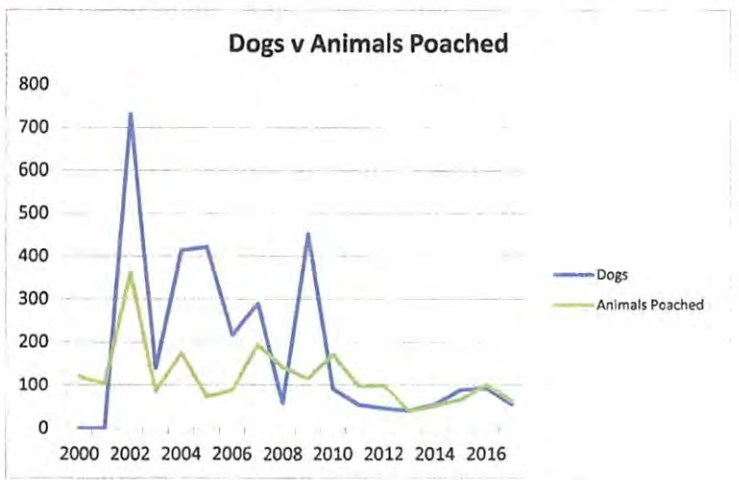
SOUTH SVC Species	Survey South SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100kr
Black-backed	800.57	68.42946995	Leopard	8.547593583	130.9	16	8.18125	130.9	6.115889992	12.22307105
Brown hyaena	800.57	31.7004926	Lion (Y=0.3049X)	3.95974026	130.9	17	7.7	130.9	6.115889992	12.98701299
Cheetah	800.57	0	Lion (Y=0.3049X)	0	130.9	0	0	130.9	6.115889992	0
Civet	800.57	222.3957773	Leopard	27.77967914	130.9	52	2.517307692	130.9	6.115889992	39.7249809
Honey badger	800.57	17.10736749	Leopard	2.136898396	130.9	4	32.725	130.9	6.115889992	3.055767762
Leopard	800.57	64.15262807	Leopard	8.013368984	130.9	15	8.726666667	130.9	6.115889992	11.45912911
Lion	800.57	48.48310633	Lion (Y=0.3049X)	6.056073338	130.9	26	5.034615385	130.9	6.115889992	19.86249045
Spotted hyaena	800.57	80.18359892	Lion (Y=0.3049X)	10.0158136	130.9	43	3.044186047	130.9	6.115889992	32.84950344
Wild dog	800.57	63.40098519	Lion (Y=0.3049X)	7.919480519	130.9	34	3.85	130.9	6.115889992	25.97402597
African wildcat	800.57	8.553683743	Leopard	1.068449198	130.9	2	65.45	130.9	6.115889992	1.527883881

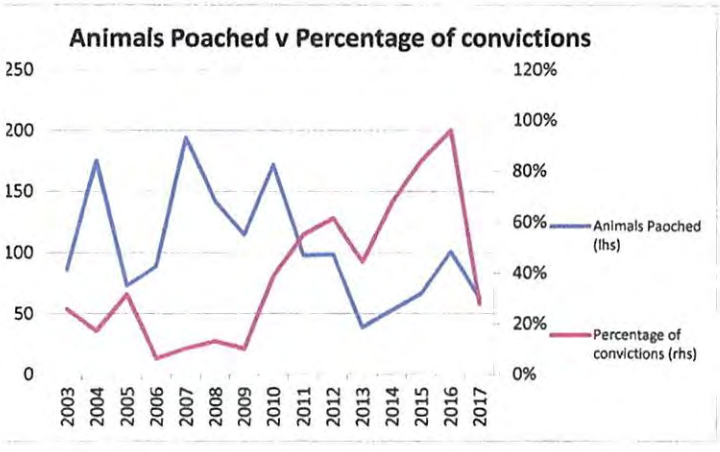
TOTAL SVC Species	Survey Total SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100k
Black-backed	2439	152.9091816	Leopard	6.269339139	390.4	35	11.15428571	390.4	6.247438525	8.965163934
Brown hyaena	2439	127.6245484	Lion (Y=0.3049X)	5.232658811	390.4	67	5.826865672	390.4	6.247438525	17.16188525
Cheetah	2439	0	Lion (Y=0.3049X)	0	390.4	0	0	390.4	6.247438525	0
Civet	2439	996.0940973	Leopard	40.84026639	390.4	228	1.712280702	390.4	6.247438525	58.40163934
Honey badger	2439	87.3766752	Leopard	3.582479508	390.4	20	19.52	390.4	6.247438525	5.12295082
Leopard	2439	323.2936983	Leopard	13.25517418	390.4	74	5.275675676	390.4	6.247438525	18.95491803
Lion	2439	186.6747126	Lion (Y=0.3049X)	7.653739754	390.4	98	3.983673469	390.4	6.247438525	25.10245902
Spotted hyaena	2439	205.7231527	Lion (Y=0.3049X)	8.434733607	390.4	108	3.614814815	390.4	6.247438525	27.66393443
Wild dog	2439	278.1072249	Lion (Y=0.3049X)	11.40251025	390.4	146	2.673972603	390.4	6.247438525	37.39754098
African wildcat	2439	39.31950384	Leopard	1.612115779	390.4	9	43.37777778	390.4	6.247438525	2.305327869

OACHING RECORDS FROM 2000 TO DATE

YEAR	POACHERS CAUGHT	DOGS	SNARES	ANIMALS POACHED	CONVICTS	%poachers convicted
2000	134	0	2393	120	?	
2001	31	0	1009	103	?	
2002	302	731	1706	362	?	
2003	85	139	635	86	22	26%
2004	180	414	1302	175	31	17%
2005	136	422	583	73	43	32%
2006	288	217	927	89	18	6%
2007	264	290	1524	194	27	10%
2008	198	59	1017	142	26	13%
2009	415	452	1158	115	42	10%
2010	272	92	1196	172	106	39%
2011	214	55	564	98	118	55%
2012	112	47	220	99	69	62%
2013	101	41	336	39	45	45%
2014	99	56	880	53	67	68%
2015	126	89	589	67	106	84%
2016	125	93	629	101	120	96%
2017	78	56	580	63	45	28%
	3160	**3015**	**15450**	**1920**	**885**	



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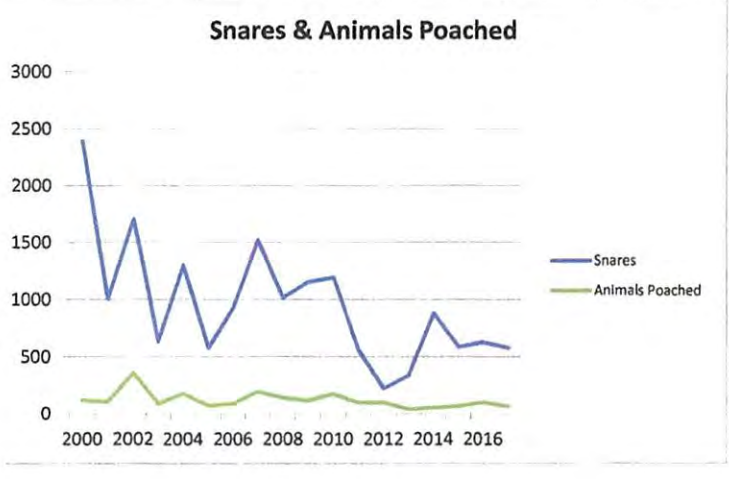
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Snares
Animals Poached

Barry, Anna <anna_barry@fws.gov>

Christopher Schnetzler PRT #22129D

1 message

Barry, Anna <anna_barry@fws.gov> Wed, Jun 26, 2019 at 4:53 PM
To: (b) (6)
Cc: "Brisendine, Amy" <amy_brisendine@fws.gov>

Dear Ms. Amy Wicklund,

The following is in response to your request regarding the status of the application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

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Barry, Anna <anna_barry@fws.gov>

Christopher Schnetzler PRT #22129D

Barry, Anna <anna_barry@fws.gov> Tue, Aug 27, 2019 at 10:40 AM
To: Legends Taxidermy (b) (6)
Cc: "Brisendine, Amy" <amy_brisendine@fws.gov>

Dear Ms. Wicklund,

The application is still pending at this time. We cannot give you a clear timeframe for when it will be finalized, but, once it is submitted to the supervisor for final review and signature, I will have Amy Brisendine (the person assigned to the application) contact you.

We are processing these applications as fast as we can.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Wed, Jun 26, 2019 at 4:53 PM
Subject: Christopher Schnetzler PRT #22129D
To: <(b) (6)>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

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The following is in response to your request regarding the status of the application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to

import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Re: Christopher Schnetzler PRT #22129D

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Aug 27, 2019 at 11:12 AM
To: Legends Taxidermy (b) (6)
Cc: "Brisendine, Amy" <amy_brisendine@fws.gov>

Ms. Wicklund,

Since after March 2018, we had to change our procedure on how these applications are processed, we cannot compare how long it took before to how long it takes now. Again we are doing the best we can.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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On Tue, Aug 27, 2019 at 10:51 AM Legends Taxidermy <(b) (6) wrote:

> Hi Anna,
>
> Thank you for the information, do you know generally how long the process from the time finalized to final review and signature has been taking?.... This application was submitted in December of 2018 and I am sure you can understand we, along with our client would like to get this into the US before anything happens to the skin from sitting during this period. Any help or information you can give us would be greatly appreciated.
>
> Thank you,
>
> Amy Wicklund
> Legends Taxidermy
> *Creating Legendary Trophies*
> 5089 North US 31
> Scottville, MI 49454
> 231-757-9589
> www.legendstaxidermy.com

On Tue, Aug 27, 2019 at 10:40 AM Barry, Anna <anna_barry@fws.gov> wrote:

Dear Ms. Wicklund,

The application is still pending at this time. We cannot give you a clear timeframe for when it will be finalized, but, once it is submitted to the supervisor for final review and signature, I will have Amy Brisendine (the person assigned to the application) contact you.

We are processing these applications as fast as we can.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Wed, Jun 26, 2019 at 4:53 PM
Subject: Christopher Schnetzler PRT #22129D
To: (b) (6) [redacted]
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

Dear Ms. Amy Wicklund,

The following is in response to your request regarding the status of the application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status

and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
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Branch of Permits, MS: IA
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RCVD FEB 20 2020

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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RENEE SNIDER

February 10, 2020

Ms. Anna Barry
USFWS/Division of Mgmt. Auth.
Via email @ anna_barry@fws.gov

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Applicant: Chris Schnetzler
Location: Zimbabwe
Species: Lion
PRT No.: 22129D

Dear Ms. Barry & Ms. Brisendine:

Please be advised that Conservation Force has been asked to represent the applicant, Mr. Schnetzler, in respect to his application for a Zimbabwe lion sport hunted trophy. A signed Notice of Representation is attached.

This is a supplement to his original import permit application. Since his original application had some blanks we have provided that information. The amendments are on Page 4 and apply to questions #7 and #9. I have attached a new page 4, which should replace the old page 4 of the original application. Also, attached are the documents supporting question #7. Finally, I have attached additional enhancement documentation as follows: (1) Lion Hunting In Zimbabwe's Savé Valley Conservancy, *A Conservation Success Story* by Dr. Rosemary Groom, (2) *Carnivore Densities in the Savé Valley Conservancy* and (3) Appendix I: All Spoor Survey Results for All Species Counted (2018). I believe these additional documents should suffice to complete the application.

Please contact, Tammy Piker at 504-837-1233, should you need more.

With best regards, I remain

Cordially,

Tammy L. Piker
Permits Clerk

/tlp
Attachments
1. Revised Page 4;

3240 S I-10 Service Road W, Suite 200 • Metairie, Louisiana 70001 • USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

2. Hunting Return Form – TRAS2 Application for Hunting NP/CITES 0000081272;
3. A Conservation Success Story;
4. Carnivore Densities in the Savé Valley Conservancy, and
5. Appendix I: All Spoor Survey Reports for All Species Counted (2018)

---

cc: Mr. Chris Schnetzler ***(w/o attachments)***

REVISED PAGE 4

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Name of Safaris Outfitter- Tredelk Safaris Name of Safaris Company- Tredelk Safaris. Name of professional hunter - Guy Whittall- Professional hunter number 421

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Consultants International 4 Josiah Chinamano Road Belmont Bulawayo Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild {if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

Please see attached documentation.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia,** you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:

Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
City:	Belmont
State/Province:	Bulawayo Zimbabwe
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act. please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see information included with application

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Please see information included with application

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see information included with application

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Christopher F Schnatzler

Date: 8/27/19

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 9 October 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Tredelk Safaris who have applied for a permit to hunt 1 x lion with client **Chris Schnetzler** in the following property:

- Humani and Bedford in Save Valley Conservancy Masvingo Province

The hunt will be **from 12 October 2018 to 26 October 2018**under the guidance of professional hunter G. Whittal PH license number 421.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~ 9/10/18

Investigation and Security Manager **Date**

Approved/ Not Approved: 15/10/18

Head Management Services **Date**

For and on behalf of the Director General

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081272
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Tredelk Trading (Pvt) Ltd	**Client's Full Name**	Chris Schnetzler
ZTA (HOP) No.	HOP0304	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	11 Hazeldene Road Borrowdale Harare	**Address**	(b) (6) Powell ,Ohio
Name of Professional Hunter	G WHITTAL	**Licence No.**	421
Telephone		**Fax**	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	**Address**	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	**Address**	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent		**Address**	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Humani	Masvingo	
2	Mkwasine Cent Ext	Masvingo	
3	Bedford	Masvingo	
4	Senuko 2	Masvingo	
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	12-10-2018
Date of Safari To	26-10-2018
Daily Rate Charged For Big Game USD	1,400.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	21,379.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	18,950.00
Other fees (Incidentals)	1,230.00	Grand Total USD	41,559.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Humani	36k143280	20-OCT-2018	24 7/8"	15,000
2	GIRAFFE	M	Killed	Humani	36K383895	14-OCT-2018		1,500
3	GIRAFFE	M	Killed	Humani	36K497538	12-OCT-2018		1,500
4	HYENA	M	Killed	Humani	36k175425	21-OCT-2018		850
5	IMPALA	M	Killed	Humani	36K339142	16-OCT-2018	48"	100
6								
7								
8								
9								
10								
11								
12								
13								
14								
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16								
17								
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19								
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24								
25								
26								
27								
28								
29								
30								

I .....hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client _____ Date _____

Signature of Professional Hunter _____ Date _____

Signature of Safari Operator _____ Date _____

Lion Hunting in Zimbabwe's Savé Valley Conservancy
A Conservation Success Story

Dr Rosemary Groom
African Wildlife Conservation Fund

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, proposals were drawn up to form what would have been known as the Savé Valley Intensive Conservation Area (du Toit 1989). The initial focus of the proposal was to create a single large wildlife area, especially for the re-establishment of endangered species and species that had been overexploited in the past. Cattle ranching would still remain the primary land use option with wildlife an additional source of income.

The formation of the Savé Valley Conservancy came in June 1991 with the signing of the first constitution by the various members. However, the following 1991/1992 rainy season proved to be the driest season ever recorded, and proved to be a deciding factor for the landowners of the Savé Valley Conservancy with regards to future land use. At a workshop held in November 1992 a decision was taken that wildlife would be the primary land use option and that all cattle still owned within the conservancy would be disposed of. This created what was at the time the largest private wildlife conservancy in the world, with 340 839 hectares included (Fig 1).

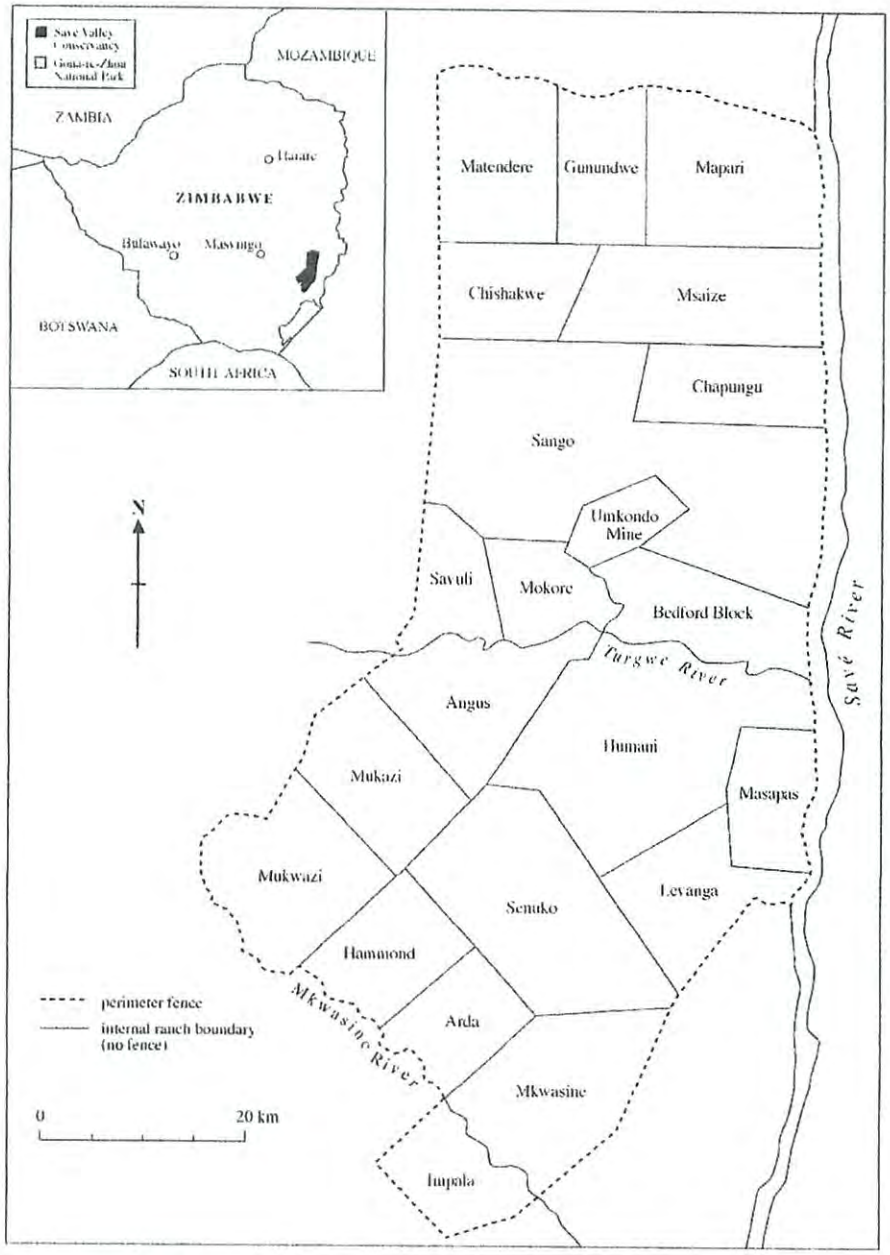


Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members were then faced with the challenge of rebuilding the wildlife population, removal of all internal fencing, the erection of a common perimeter fence and security. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Some wildlife species had been translocated into the conservancy prior to 1991 (including black rhino, elephant, sable, eland, nyala, giraffe, waterbuck, wildebeest and zebra; Table 1). Species relocated into the SVC since signing the constitution in June 1991 include more black rhino, buffalo, elephant, eland, giraffe, nyala, sable antelope, spotted hyena, tsessebe, Lichtenstein's hartebeest, warthog, waterbuck, blue wildebeest, zebra and lion (Table 1).

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	**Total**
African buffalo (*Syncerus caffer*)	91	88	253	40	**472**
African elephant (*Loxodonta africana*)	624	-	-	-	**624**
Black rhinoceros (*Diceros bicornis*)	-	31	-	-	**31**
Blue wildebeest (*Connochaetes taurinus*)	223	525	49	-	**797**
Burchell's zebra (*Equus burchellii*)	17	309	66	-	**392**
Giraffe (*Giraffa camelopardalis*)	36	101	44	-	**181**
Lichtenstein's hartebeest (*Alcelaphus lichtensteinii*)	-	-	-	28	**28**
Livingston's eland (*Tragelaphus oryx*)	215	263	102	-	**580**
Nyala (*Tragelaphus angasii*)	22	43	11	26	**102**
Lion (*Panthera leo*)	**-**	**3**	**-**	**10**	**13**
Spotted hyena (*Crocuta crocuta*)	-	-	-	3	**3**
Ostrich (*Struthio camelis*)	-	-	71	-	**71**
Sable antelope (*Hippotragus niger*)	49	203	122	-	**374**
Tsessebe (*Damaliscus lunatus*)	-	97	-	-	**97**
Warthog (*Phacochoerus aethiopicus*)	-	207	-	-	**207**
Waterbuck (*Kobus ellipsiprymnus*)	177	66	82	32	**357**
White rhinoceros (*Cerathotherium simum*)	-	-	-	20	**20**
TOTAL					**4349**

3 Trophy hunting vs Ecotourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, continue the re-stocking and increase the security, especially due to the now significant numbers of black rhino in the conservancy. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

3.1 The Land Reform Program

The land reform program was launched in February 2000 and created negative press from the international community. This resulted in travel bans and warnings from most of Zimbabwe's source markets, which, compounded by the negative publicity in the media, resulted in major suppliers withdrawing their support. In the case of the Senuko Lodge, this resulted in a 98% cancelation of the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snaring (bushmeat poaching) was extreme. For example, in the following eight year

period (2001 to 2009), 10,520 illegal hunting incidences were recorded in the conservancy, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al 2011).

The associated political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC.

4 Lions in the Savé Valley Conservancy

As mentioned, lions, and all other large predators were virtually or completely eradicated during the cattle ranching era (du Toit 1994, Pole 1999). Once persecution stopped, lion numbers began to pick up, but initial recovery was slow, probably because of a depleted source population. Evidence of lions were first noticed in the late 1990s / early 2000s, but were almost exclusively of males. Very few signs of females were observed until 2003, when small family groups and male-female pairs were observed. By 2004-5 there were some reports of cubs. Population recovery has been largely through natural recolonisation, although 13 lions were reintroduced between 1993 and 2005.

In 1993, three lions were brought into the conservancy by Humani Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Lions have been monitored in the Savé Valley Conservancy since 1999 when the first survey was conducted (Pole 1999). Track index or call-up surveys were then conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Results of the surveys indicate that the lion population in the Savé Valley Conservancy has been undergoing exponential population increase (Figure 1; Groom 2012). Using prey availability models (Hayward et al 2007), it was calculated that the population in 2011 was only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless controlled.

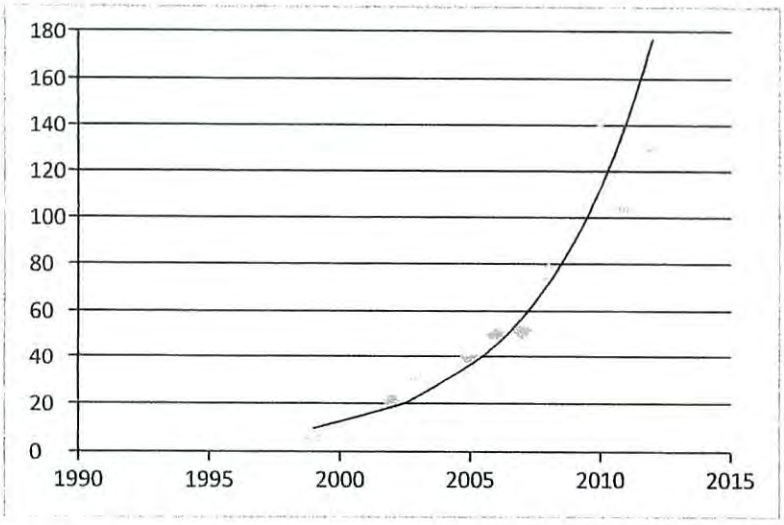


Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012).
Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional, scientific lion management plan was commissioned by the conservancy in 2011 (Funston 2011; Appendix 1). The aim of the plan was to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool, based on the evidence of good hunting practice in the conservancy. It demonstrates willingness by the conservancy to guide their hunting policy based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	**2001**	**2002**	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100 %	100 %	100 %	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy in recent years. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. $2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of $10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US $1,365,000 in bed nights and $260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. $375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

Lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed investment of c. US$ 136.000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). An additional US$ @@@ was spent by members on a central anti-poaching unit for the battle against rhino poaching. A removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs and especially black rhinos (an IUCN Key 1 population).

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

5.1 The impact on neighbouring communities

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US$85,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Recently the conservancy has signed a deal with the chiefs of all the neighbouring wards.....

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers. The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

7 References

Bond, I. (1993) The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe

Child, B (1988) The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. DPhil Thesis, University of Oxford, Oxford, UK

Cumming, D.H.M (1993) Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Funston, P.J. (2011) The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy

Groom, R.J. (2012) Carnivore densities in the Savé Valley Conservancy: 2012. Report for the Savé Valley Conservancy

Hayward, M.W., O'brein, J. & Kerley, G.I.H. (2007) Carrying capacity of large African predators: predictions and tests. Biological Conservation, **139**, 219-229

Jansen, D.J., Child, B. & Bond, I. (1992) Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe

Lindsey, P., du Toit, R., Pole, A. & Romanach, S. (2008) Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

Lindsey, P., Romanach, S., Tambling, C., Chartier, K. & Groom, R.J. (2011) Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx, **45**, 96-111

Pole, A. (1999) The behaviour and ecology of African wild dogs, *Lycaon pictus*, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland

du Toit, R. (1989)

du Toit, R. (1994) The Savé Valley Conservancy. In: The Lowveld Conservancies: New opportunities for productive and sustainable land use, pp. 28-36: Price Waterhouse Wildlife, Tourism and Environmental Consulting, Zimbabwe

Carnivore Densities in the Savé Valley Conservancy

Results of the 2018 Spoor Survey & Wild Dog Monitoring Project

Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

(Spoor survey carried out by Amy Wolton, Rueben Boté, and Douglas Tomwe)

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of carnivores within the Savé Valley Conservancy (SVC / the conservancy) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer.

Spoor surveys have been shown to be an effective and efficient means to assess wildlife densities (Stander 1998; Funston et al. 2001; Davidson & Romañach 2007; Funston et al 2010) with strong correlations existing between spoor density and true density. The technique is considered to produce reliable estimates for lions, spotted hyenas, and leopards, when sample sizes (spoor encounter rates) are sufficient. Other carnivores are included in our counts simply to monitor trends over time.

This report presents the results of the October 2018 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.

Methodology

The 2018 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of

sample area, 1km of transect was surveyed, creating a penetration density (expressed as a ratio of kilometres of transect surveyed to total sample area) of between 1:6 and 1:7.

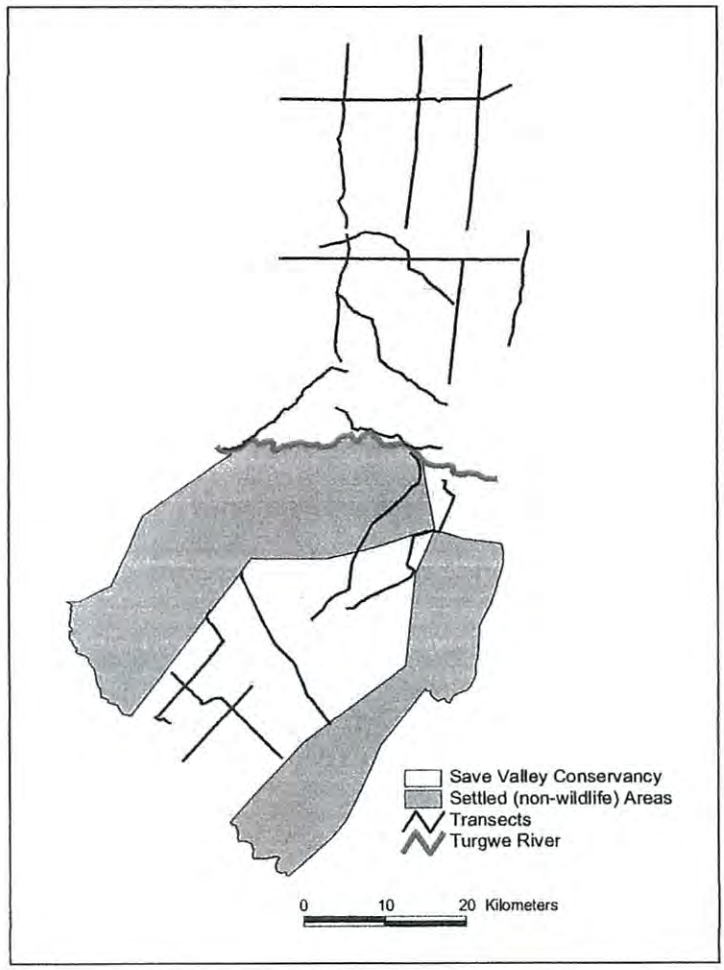
The total area of the Savé Valley Conservancy is 3,490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2,439km^2; 1,639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.5 km, giving a penetration ratio of 6.32. In southern SVC, the combined transect length was 130.9 km, giving a penetration ratio of 6.12. For the conservancy as a whole, 390.4 km were driven (penetration ratio 6.25).

Transects surveyed were the same as those used in 2007-2017 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Boté, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.6 km and 29.1 km in length, with a mean transect length of 21.7 km.

Each transect survey started as close to sunrise as possible, and wherever feasible was driven from west to east to ensure the best possible tracking conditions. Only tracks less than 24 hours old were counted. Road conditions are generally sandy, such that spoor is relatively easy to see. Where possible, spoor of individual animals were followed to reduce the likelihood of that individual being counted twice on a given transect. Spoor was recorded for all mammalian carnivores bigger than a genet.

Figure 1. Map of the transects driven – October 2018



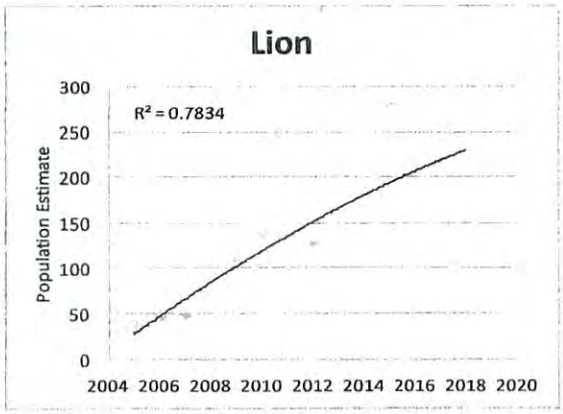
Results

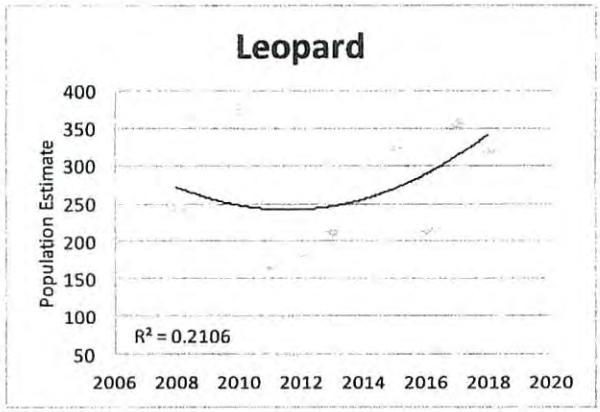
Table 1: Summary of survey parameters (2018)

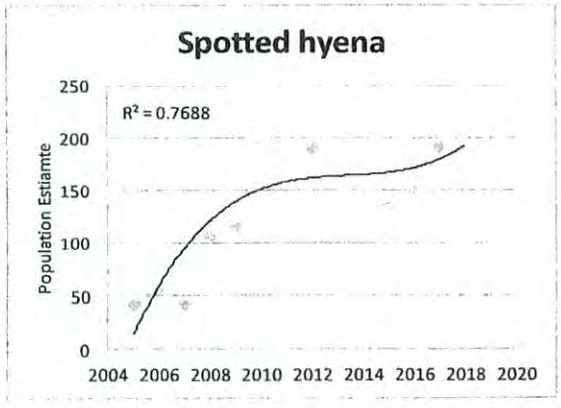
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	259.5	130.9	390.4
Penetration ratio	6.32	6.12	6.25

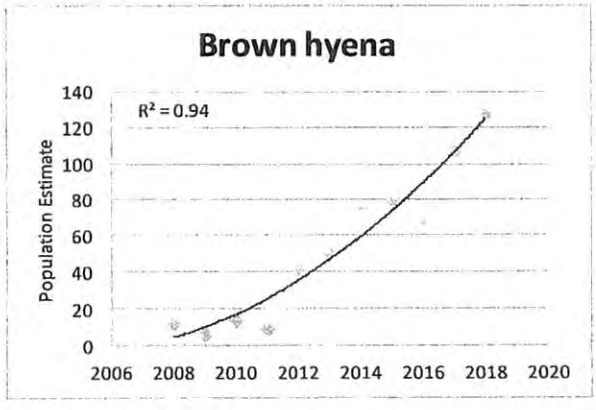
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2018 (from 2005-2018 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs only).

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223	187
Leopard				245	252	378	172	189	218	295	328	221	359	323
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193	206
Brown hyena				12	6	14	10	41	50	75	80	70	107	128
African Wild dog				45	60	64	61	86	90	81	91	99	94	96
Black backed jackal				188	190	157	141	151	199	229	241	234	296	153









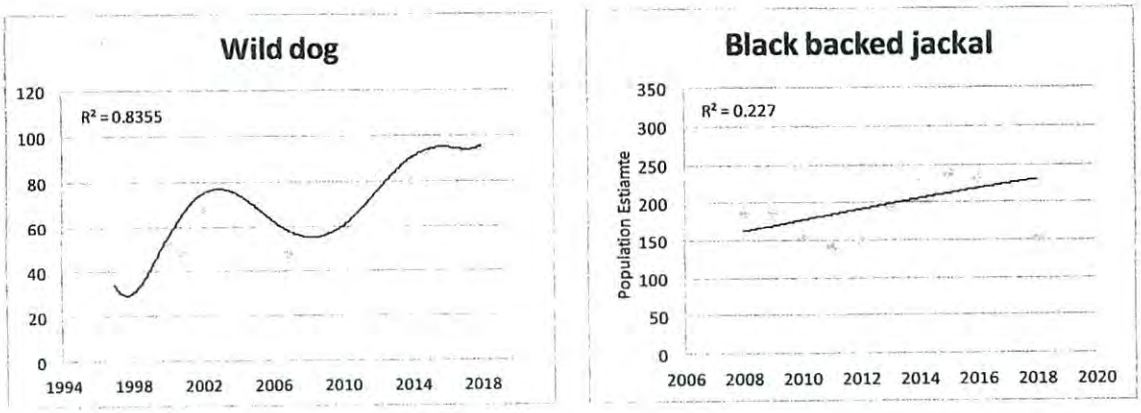


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

The results show a slight drop in lion and leopard numbers, and a significant decline in black backed jackals (currently unclear as to whether this represents a genuine decline or simply a low count). The spotted and brown hyenas, and wild dog population, remain stable and/or increasing.

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to have been relatively stable since 2014, with a few natural fluctuations. Despite the slight decrease in estimated individuals since last year, the population **estimate of 187 lions** in 2018 is within range of the long-term population trend (Figure 2).

The number of lions in SVC equates to a **density of 7.7 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 98 lion tracks we encountered, 22% were adult males, with 65% identified as adult females, 6% as young cubs, and 7% of tracts were unidentified. With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

In 2018 there were an estimated **323 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2011 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a positive trend (Figure 2).

Leopards are at a **density of 13.3 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in other places, for example in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (8.1 / 100km²; Groom & Watermeyer 2018). Finally, the SVC leopard population appears to display a 2:1 ratio skewed in the favour

of females. Of the 74 leopard tracks we recorded, 62% were adult females and 30% were adult males. No cub tracts were recorded (0%) and 8% of the tracts were unidentified.

Derivation of population estimates from spoor densities is controversial for leopards (there are several different equations available which give different numbers) so the numbers themselves should be treated with caution. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. Indeed, there were an estimated **206 spotted hyenas** in 2018. The hyena population could be doing better in light of the recently stabilising lion numbers, but we will need to monitor the population to determine if a true trend is emerging.

Spotted hyenas are at a density of **8.4 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 10.4 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2018). Given the relatively lower density of the species in the conservancy, they may still increase more (especially if the lion numbers continue to drop).

There were an estimated **128 brown hyenas** in the conservancy in 2018. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **5.2 brown hyenas / 100km²** in 2018 which is higher than the average (3.4 brown hyenas / 100km²) over the last few years (2014-2017).

As reported consistently for the past few years, the **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 96 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km²)**. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 278 wild dogs in the conservancy, with a density of 11.4 African wild dogs / 100km². This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

When counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time. Nonetheless, their population has been relatively stable since 2011.

There has been a significant decrease in the **black backed jackal** population estimate for the conservancy. At an estimated **153 black backed jackals** in 2018, this is the lowest count of the species since 2013. Whether this is a true decline or not is unclear. At this stage, however, we are cautiously treating the 2018 count as an anomaly, but this species will need to be watched very closely. The estimated density of jackals was **6.3 jackals / 100km²** in 2018.

We once again stress, that the spoor encounter rate for **cheetah** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetah, even with large confidence intervals. Indeed, **we did not pick up a signal track for cheetah in the 2018 spoor survey**. Although we know that there are resident cheetah in the conservancy, we can safely say the population is still very low (zero cheetah tracks were seen in the 390.4 km of transects driven in 2018). However, spoor surveys are not appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. **The Cheetah Conservation Project Zimbabwe, which collected updated photographic information on cheetah throughout Zimbabwe, estimated c. 12 adult cheetahs in SVC in 2015 (van der Meer, 2016).** We have no reason to think this number has changed much.

Word of caution

When interpreting the results in the graphs and tables at the end, please do so with caution, especially to quote specific numbers. For lions and hyenas we are confident that these spoor surveys are relatively accurate in the numbers they predict, although occasional anomalous over and undercounts need to be treated carefully. Likewise, we can trust the numbers for wild dogs, as they are from AWCF's detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give different population estimates from each other. The spoor survey technique has not been calibrated for species like jackals, civets, even brown hyenas, so while the data is useful for looking at trends, using population figures directly from the graphs for these species is unadvisable.

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

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Appendix 1: All Spoor Survey Results for All Species Counted (2018)

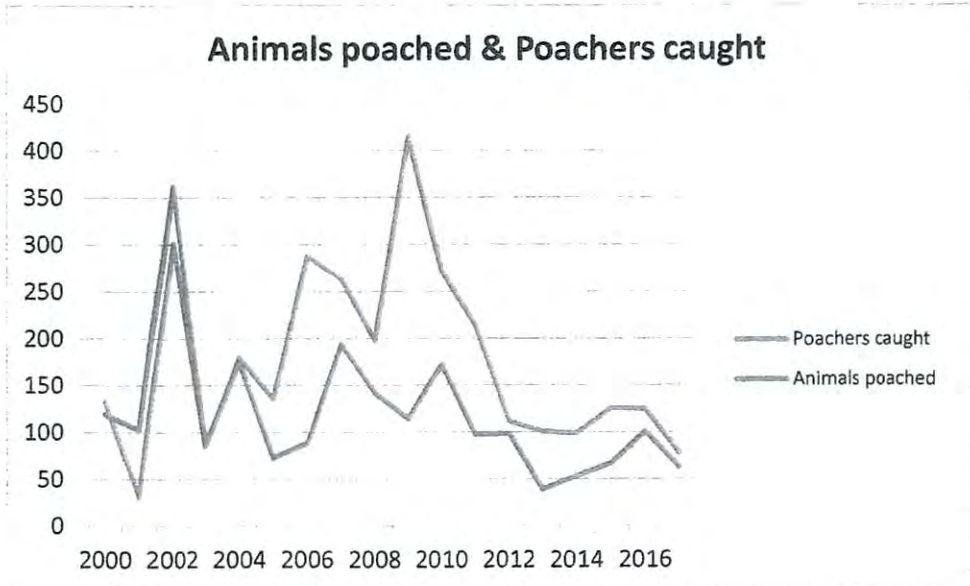
NORTH SVC Species	Survey North SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed	1639	83.9186948	Leopard	5.120115607	259.5	19	13.65789474	259.5	6.315992293	7.32177264
Brown hyaena	1639	96.2873025	Lion (Y=0.3049X)	5.874759152	259.5	50	5.19	259.5	6.315992293	19.26782274
Cheetah	1639	0	Lion (Y=0.3049X)	0	259.5	0	0	259.5	6.315992293	0
Civet	1639	777.3521202	Leopard	47.42843931	259.5	176	1.474431818	259.5	6.315992293	67.82273603
Honey badger	1639	70.66837457	Leopard	4.311676301	259.5	16	16.21875	259.5	6.315992293	6.165703276
Leopard	1639	260.5896312	Leopard	15.89930636	259.5	59	4.398305085	259.5	6.315992293	22.73603083
Lion	1639	138.6537156	Lion (Y=0.3049X)	8.459653179	259.5	72	3.604166667	259.5	6.315992293	27.74566474
Spotted hyaena	1639	125.1734933	Lion (Y=0.3049X)	7.637186898	259.5	65	3.992307692	259.5	6.315992293	25.04816956
Wild dog	1639	215.6835576	Lion (Y=0.3049X)	13.1594605	259.5	112	2.316964286	259.5	6.315992293	43.15992293
African wildcat	1639	30.91741387	Leopard	1.886358382	259.5	7	37.07142857	259.5	6.315992293	2.697495183

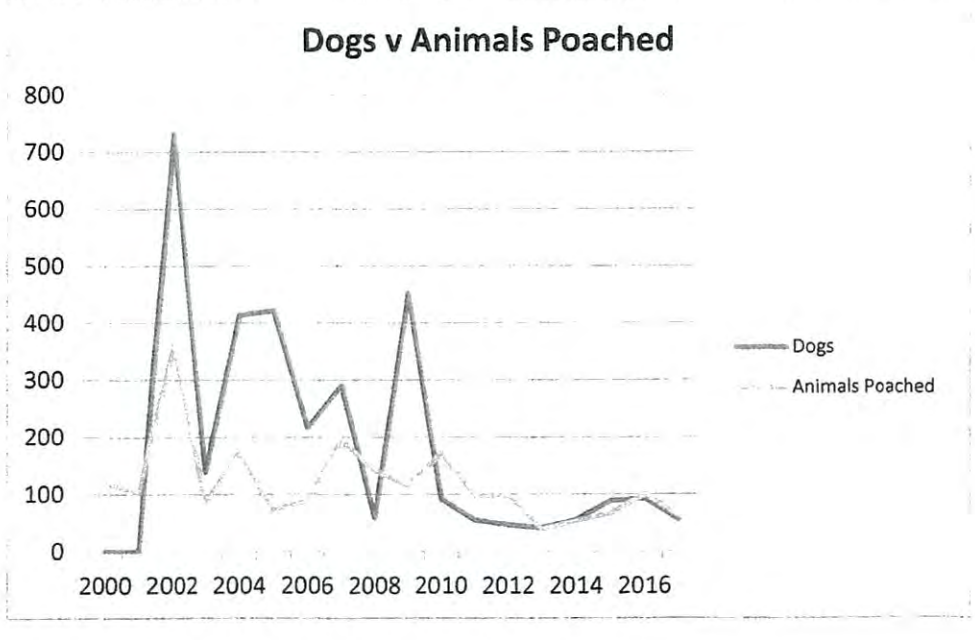
SOUTH SVC Species	Survey South SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed	800.57	68.42946995	Leopard	8.547593583	130.9	16	8.18125	130.9	6.115889992	12.22307105
Brown hyaena	800.57	31.7004926	Lion (Y=0.3049X)	3.95974026	130.9	17	7.7	130.9	6.115889992	12.98701299
Cheetah	800.57	0	Lion (Y=0.3049X)	0	130.9	0	0	130.9	6.115889992	0
Civet	800.57	222.3957773	Leopard	27.77967914	130.9	52	2.517307692	130.9	6.115889992	39.7249809
Honey badger	800.57	17.10736749	Leopard	2.136898396	130.9	4	32.725	130.9	6.115889992	3.055767762
Leopard	800.57	64.15262807	Leopard	8.013368984	130.9	15	8.726666667	130.9	6.115889992	11.45912911
Lion	800.57	48.48310633	Lion (Y=0.3049X)	6.056073338	130.9	26	5.034615385	130.9	6.115889992	19.86249045
Spotted hyaena	800.57	80.18359892	Lion (Y=0.3049X)	10.0158136	130.9	43	3.044186047	130.9	6.115889992	32.84950344
Wild dog	800.57	63.40098519	Lion (Y=0.3049X)	7.919480519	130.9	34	3.85	130.9	6.115889992	25.97402597
African wildcat	800.57	8.553683743	Leopard	1.068449198	130.9	2	65.45	130.9	6.115889992	1.527883881

TOTAL SVC Species	Survey Total SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed	2439	152.9091816	Leopard	6.269339139	390.4	35	11.15428571	390.4	6.247438525	8.965163934
Brown hyaena	2439	127.6245484	Lion (Y=0.3049X)	5.232658811	390.4	67	5.826865672	390.4	6.247438525	17.16188525
Cheetah	2439	0	Lion (Y=0.3049X)	0	390.4	0	0	390.4	6.247438525	0
Civet	2439	996.0940973	Leopard	40.84026639	390.4	228	1.712280702	390.4	6.247438525	58.40163934
Honey badger	2439	87.3766752	Leopard	3.582479508	390.4	20	19.52	390.4	6.247438525	5.12295082
Leopard	2439	323.2936983	Leopard	13.25517418	390.4	74	5.275675676	390.4	6.247438525	18.95491803
Lion	2439	186.6747126	Lion (Y=0.3049X)	7.653739754	390.4	98	3.983673469	390.4	6.247438525	25.10245902
Spotted hyaena	2439	205.7231527	Lion (Y=0.3049X)	8.434733607	390.4	108	3.614814815	390.4	6.247438525	27.66393443
Wild dog	2439	278.1072249	Lion (Y=0.3049X)	11.40251025	390.4	146	2.673972603	390.4	6.247438525	37.39754098
African wildcat	2439	39.31950384	Leopard	1.612115779	390.4	9	43.37777778	390.4	6.247438525	2.305327869

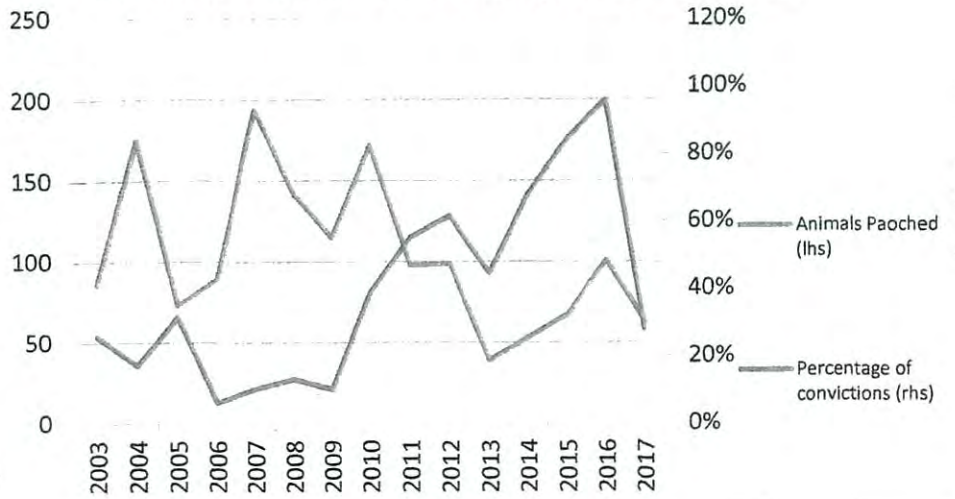
POACHING RECORDS FROM 2000 TO DATE

YEAR	POACHERS CAUGHT	DOGS	SNARES	ANIMALS POACHED	CONVICTS	%poachers convicted
2000	134	0	2393	120	?	
2001	31	0	1009	103	?	
2002	302	731	1706	362	?	
2003	85	139	635	86	22	26%
2004	180	414	1302	175	31	17%
2005	136	422	583	73	43	32%
2006	288	217	927	89	18	6%
2007	264	290	1524	194	27	10%
2008	198	59	1017	142	26	13%
2009	415	452	1158	115	42	10%
2010	272	92	1196	172	106	39%
2011	214	55	564	98	118	55%
2012	112	47	220	99	69	62%
2013	101	41	336	39	45	45%
2014	99	56	880	53	67	68%
2015	126	89	589	67	106	84%
2016	125	93	629	101	120	96%
2017	78	56	580	63	45	28%
	3160	**3015**	**15450**	**1920**	**885**	

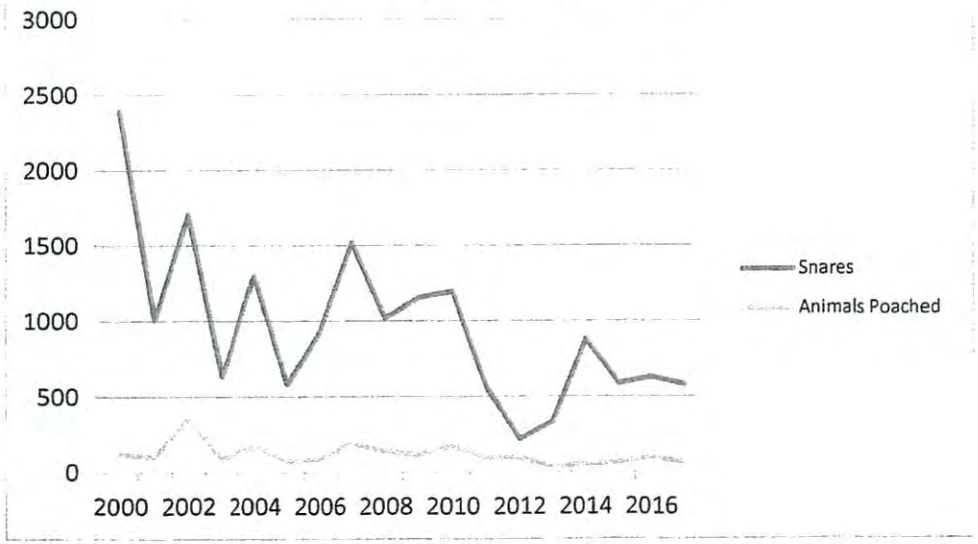




Animals Poached v Percentage of convictions



Snares & Animals Poached



United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:23:57 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 22129D

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:00:43 -04'00'

Enhancement Finding

Applicant: Christopher Robert Schnetzler (PRT–22129D)

Introduction

Christopher Robert Schnetzler submitted an application on January 28, 2019, for the importation of one male lion *(Panthera leo melanochaita)* taken on October 19, 2018, from the Savé Valley Conservancy (SVC), Humani Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Christopher Robert Schnetzler hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Schnetzler's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Schnetzler himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Savé Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Schnetzler's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Schnetzler supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Schnetzler, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Schnetzler in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Schnetzler's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Schnetzler's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Schnetzler's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Schnetzler, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Schnetzler's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Schnetzler submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Schnetzler plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Schnetzler's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Schnetzler's permit request, we find that the expertise, facilities, or other resources available to Mr. Schnetzler appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Schnetzler's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Schnetzler's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Schnetzler on October 19, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Christopher Schnetzler of Powell, Ohio.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 13, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:17:37 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 22129D, Christopher Robert Schnetzler, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 15:24:38 -04'00'

Signature: _____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA22129D-0

Effective: 08/14/2020 Expires: 08/13/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE

Digitally signed by AMY BRISENDINE
Date: 2020.08.14 08:06:08 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHRISTOPHER ROBERT SCHNETZLER
(b) (6)
POWELL, OH 43065
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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February 6, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD FEB 8 2019

RE: Import Application of Zimbabwe Lion Trophy for Mark Baker

Dear Chief Cogliano:

Enclosed please find the permit application to import of a lion trophy from Zimbabwe for Mark Baker. Also attached to the permit application is the 2018 Operator Enhancement repot from Mazunga Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Mark Baker's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: C. Mark Baker

Date: 2/5/19

RCVD FEB 8 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Type of Activity: Lion - Zimbabwe

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Baker	Charles	Mark	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Houston	Texas	77024	Harris	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 1/31/19

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as in Section A and Section C on page 1.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Charles Mark Baker
   Cell Phone: (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

Not applicable.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthero Leo, Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Zimbabwe, Bubye Valley Conservancy, Matabeleland South.
Nearest city: Beit Bridge. See attached Map.

   b. Date wildlife is to be hunted:

October 7-26, 2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Mazunga Safaris with PH John Sharp

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I have not hunted yet and do not currently hold any such permits or licenses.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Stephen Collett
Address: Collett's Wildlife Artistry
City: 15 Josiah Chinamano Avenue
State/Province: Bulawayo
Country, Postal Code: Matabeleland, Zimbabwe NIL

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

No. See attached Operator Enhancement Report and information furnished by Zimb Parks and CONSERVATION FORCE

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

D/Rs=$54000 & TR.Fee=$47000. Approx. 30% of all earnings funds Anti-Poaching operations (mainly protection of Rhino, which are State-owned and BVC are just custodians). Schools within 10 kms of boundary are part of annual community development program. 3600kgs meat donated every month.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

BVC has conducted 7 years of in-depth research on both Lions and Leopards, along with annual population surveys of other predators and all herbivores. BVC = Bubye Valley CONSERVANCY

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

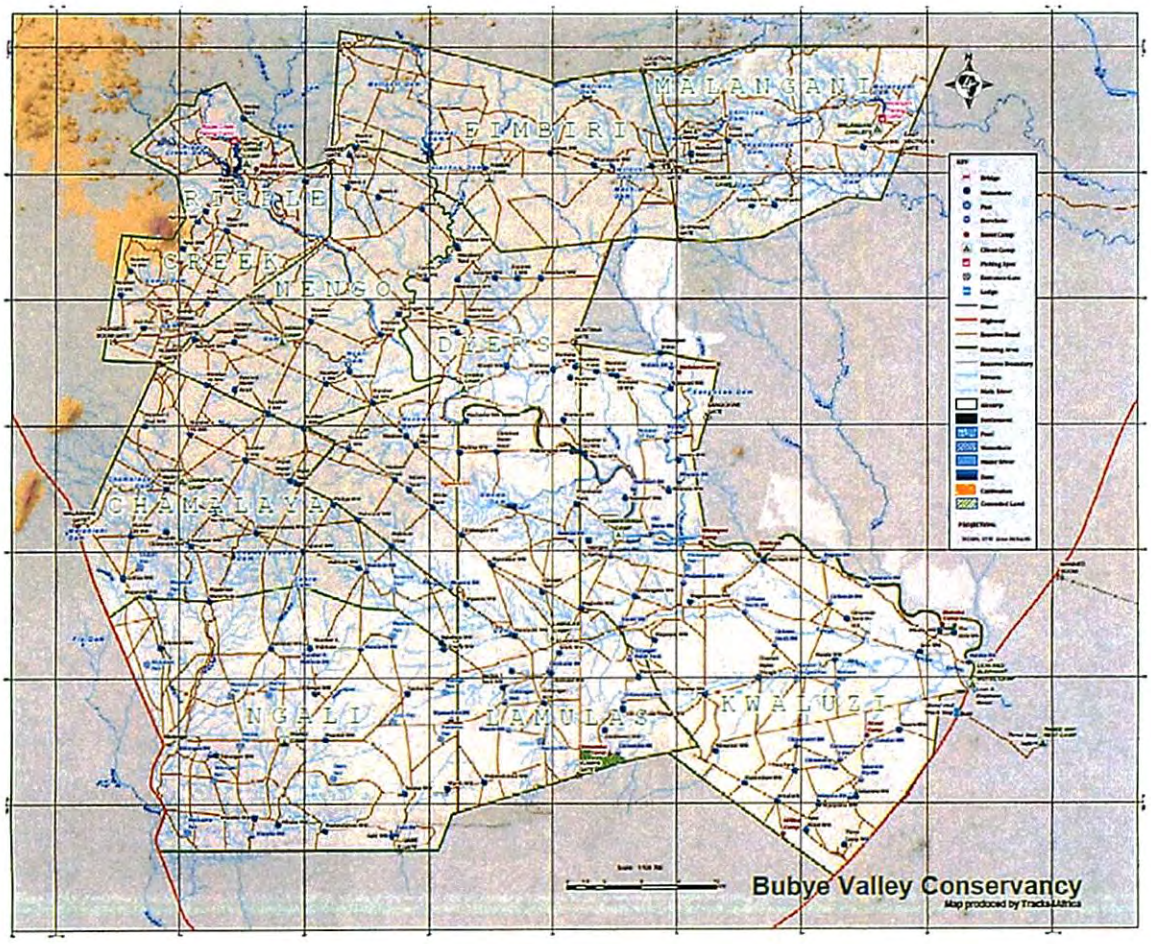
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 1/31/19

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

5.a.


MALANGANI
EIMBIRI
GREEK
MENGO
DZERS
CHAMELAVA
NGALI
LAMULAS
KWALUZI
Bubye Valley Conservancy

ZAMBIA
RIFA SAFARI AREA
MANA POOLS
0 100 Kilometres
Kariba
LAKE KARIBA
CHARARA SAFARI AREA
MUZARABANI
MATUSADONA
Karoi
CHAMINUKA
UMFURUDZI
CAPRIVI STRIP
Chinoyi
GOKWE NORTH
Harare
ZAMBEZI
Victoria Falls
HARTLEY
Marondera
CHIRISA
MATETSI
BINGA
Hwange
GOKWE SOUTH
Kadoma
RHODES NYANGA
KAZUMA PAN
MATETSI
DEKA
Kwekwe
Mutare
HWANGE
Gweru
CHIMANIMANI
TSHOLOTSHO
BOTSWANA
Bulawayo
Masvingo
CHIPINGE
BULUMA MANGWE
Plumtree
RHODES MATOPOS
CHIREDZI
LOWVELD
GONAREZHOU
BEITBRIDGE
Beitbridge
SOUTH AFRICA
MOZAMBIQUE
ZIMBABWE
HUNTING AREAS
National Park (Non-Hunting)
Safari Area (Hunting)
Campfire Area (Hunting)
John Sharp Hunting Area

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: **MAZUNGA SAFARIS**

   a. Years in business: **22 YEARS**

   b. Name of company conducting hunt: **MAZUNGA SAFARIS**

   2. Name of concession: **BUBYE VALLEY CONSERVANCY** Size in km^2: 3400

   a. Land tenure: __ Government lease __ Community __ Private ranch **XX Private Conservancy**

   b. Length of concession agreement: **OWNER** Can it be renewed? __ Yes __ No – **N/A**

   c. Length of renewal, if applicable: **N/A**

   d. Estimated total amount received in trophy fees last year, if applicable: $ **1,890,000-00**

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **SHAREHOLDERS EXPECT ANNUAL REPORTING AND MAZUNGA PARTICIPATES IN ALL OF THE ABOVE WITH EARNINGS FROM HUNTING OPERATIONS FUND :-**

   - **THE RHINO PROTECTION OPERATIONS**
   - **COMMUNITY DEVELOPEMENT AND SUPPORT**
   - **THE MAJORITY OF THE 400 EMPLOYEES ARE FROM SURROUNDING COMMUNITIES.**

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **BEIT BRIDGE DISTRICT OF MATABELELAND SOUTH – BEIT BRIDGE - MAP ATTACHED.**

   g. If the concession borders a national park, please provide the park name: **N/A**

   h. Description of general and distinctive habitat features and any water features: **LOW LYING ARID MOPANE WOODLAND WITH THE BUBYE RIVER RUNNING THROUGH THE MIDLLE OF THE PROPERTY – SEASONAL RIVER, NOT PERENNIAL. A NUMBER OF DAMS CONSTRUCTED FOR GAME WATER SUPPLIES AND ALL WATER POINTS (APPROX. 350) ARE PUMPED FROM THE DAMS OR BOREHOLES....I.E. ARTIFICIAL WATER POINTS.**

3. Are there any communities living in the concession? __ Yes **XX** No

   a. If so, estimated number of people or villages in the concession? **N/A**

4. Are there communities bordering this concession? XX Yes __ No

   a. If so, estimated number of people or villages around the concession? **OVER 2000**

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance	Est. population	3-Year trend (up/	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

	(dense/avg./sparse)		down/ stable)	
Elephant	**AVERAGE**	**+/- 800**	**INCREASING**	**ANNUAL ESTIMATES**
Lion	**DENSE**	**500 +**	**STABLE / MANAGED**	**ANNUAL BAITED CALL-UP SURVEY**
Leopard	**AVERAGE**	**260 - 300**	**STABLE**	**ANNUAL C/TRAP SURVEY**
Prey species	**DENSE**		**DOWN BECAUSE OF LION PREDATION**	**ANNUAL ROAD STRIP COUNTS**

6. Total employment number: **400 +...various slightly during the year**

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	**12**	**nil**
Trackers	**30+**	**+/- 20 %**
Anti-poaching scouts/rangers	**130**	**+/- 70%**
Other anti-poaching	**FENCE GUARDS 48**	**+/-80%**
Cooks/housekeepers	**43**	**+/- 60%**
Community coordinators	**4**	**100%**
Managers	**13**	**2**
Biologists	**2**	**NIL**
Others: _____	**1 NGO RESEARCHER – RHINO MONITORING**	

7. Number of staff employed in the off-season: **400 +**

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	**130**	**+/- 70%**	**FULL TIME**
Managers	**13**	**2**	**FULL TIME**
Maintenance	**30+**	**+/- 80%**	**FULL TIME**
Road opening/construction	**50+**	**+/- 80%**	**FULL TIME**
Community relations personnel	**4**	**4**	**VARIES**
Others: _____	**+/- 190**	**+/- 80%**	**FULL TIME**

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **130 SCOUTS & 48 FENCE GUARDS**

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH – 365 DAYS PER YEAR.**

c. Months during which anti-poaching patrols are conducted: **JAN. – DEC.**

d. Number of anti-poaching patrols per month: **AVE. 50 - 55 AT ANY TIME**

e. Description of anti-poaching equipment, vehicles, etc.: **4 MOBILE VEHICLE REACTION UNITS AND THE REST FOOT PATROLS THAT ARE BASED IN SPECIFIC PATROL AREAS.**

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **4 MANAGERS ARE EMPLOYED AS FULL TIME ANTI-POACHING COORDINATORS.**

g. Do you offer rewards to poaching informants leading to arrest? **XX Yes** __ No

h. Do you offer rewards to poaching informants upon conviction? **XX Yes** __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **U.S.$**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS	**600 000**	**780 000**	**1.200 000**	**INCREASED THREAT TO RHINO HAS NECCESSITATED AN INCREASE IN A/P EXPENDITURE OVER THE PAST 5 YEARS.**

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	**60 - 100**	**60 - 100**	**60 - 100**	
Elephant carcasses observed	**0**	**0**	**0**	**NO POACHING RECORDED**
Lion carcasses observed	**0**	**0**	**0**	**NO POACHING RECORDED**
Leopard carcasses observed	**0**	**0**	**0**	**NO POACHING RECORDED**
Ivory poachers arrested	**0**	**0**	**0**	
Meat poachers arrested	**AVE. =/- 20**	**AVE. =/- 20**	**AVE. =/- 20**	
Other poachers arrested	**1**	**1**	**4**	**Armed Rhino poachers**
Poachers convicted	**0**	**1 + 1**	**0**	**A NUMBER DEFAULTED**

		killed		**AFTER BEING REMANDED OUT OF CUSTODY.**
Snares/gin traps collected				**+/- 200 SNARES PER YEAR.**
Firearms confiscated	**1**	**0**	**1**	
Vehicles confiscated	**0**	**0**	**0**	
Bicycles confiscated	**0**	**0**	**0**	
Boats/nets confiscated	**+/- 10-NETS**	**+/- 10-NETS**	**+/- 10-NETS**	**NO BOATS**
Tusks recovered	**0**	**0**	**0**	
Other: **RHINO HORNS**	**3**	**11**	**4**	**Note: 2018 results are far better – arrests & kills , rifles recovered & convictions.**

10. Community investment:[3]

    a. Does the company contribute money or goods/services to local communities? **XX Yes** __ No

    b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **AVE OF BETWEEN US$ 150000 TO 250 000 PER YEAR – VOLUNTARY**

    c. Does the company provide game meat to nearby communities? **XX Yes** __ No

    d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: **3600 KGS PER MONTHS (US$ 10 800/MONTH) OR 43 – 44 TONS (US$ 132 000) PER YEAR EQUALLY ALLOCATED TO THE 3 DISTRICTS THAT THE CONSERVANCY FALLS WITHIN.... Beit Bridge, Mwenezi & Gwanda**

    e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. PAC KILLINGS ON REQUEST FROM NATIONAL PARKS & WILD LIFE AUTHORITY.

    f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **NIL – CONSERVANCY HAS AN ELECTRIC GAME FENCE TO PREVENT HUMAN / WILDLIFE CONFLICT.**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	N/A	N/A	N/A	N/A
Lion	N/A	N/A	N/A	N/A
Leopard	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **U.S.$**

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	**71000**	**134000**	**110000**	**REDUCED HUNTING INCOME AND MORE FUNDS REQUIRED FOR RHINO PROTECTION OPERATIONS.**
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)	**178000**			**MTETENGWE CLINIC – 3 YEAR PROJECT**
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded	**2300**			**SPORTS UNIFORM – PENMEMENE SCHOOL ..FOR PROVINCIAL FINALS.**
Construction materials donated	**+/- 10 000**	**+/- 10 000**	**+/- 10 000**	
Other: _____				
Other: _____				
TOTALS	**251300**			

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	**2015: 4** **2016: 6** **2017: 3**	**2015: 9** **2016: 10** **2017: 10**	**2015: 13** **2016: 12** **2017: 5**	**2015: 103** **2016: 107** **2017: 96**
Percentage of U.S. clients	**2015: 100 %** **2016: 66 %** **2017: 60 %**	**2015: 75 %** **2016: 91 %** **2017: 46 %**	**2015: 87 %** **2016: 86 %** **2017: 83 %**	**2015: 90 %** **2016: 92 %** **2017: 81 %**
Trophy fees paid by U.S. clients	**2015: 15000** **2016: 33660**	**2015: 315000** **2016: 425040**	**2015: 78300** **2016: 103200**	**2015: 1602148** **2016: 1478123**

clients	**2016:6** **2017: 3**	**2016: 10** **2017: 10**	**2016: 12** **2017: 5**	**2016: 107** **2017: 96**
Percentage of U.S. clients	**2015: 100 %** **2016: 66 %** **2017: 60 %**	**2015: 75 %** **2016: 91 %** **2017: 46 %**	**2015: 87 %** **2016: 86 %** **2017: 83 %**	**2015: 90 %** **2016: 92 %** **2017: 81 %**
Trophy fees paid by U.S. clients	**2015: 15000** **2016: 33660** **2017: 21000**	**2015:315000** **2016: 425040** **2017: 197800**	**2015:78300** **2016: 103200** **2017: 74700**	**2015:1602148** **2016: 1478123** **2017: 1403835**

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:- --- **OVER THE LAST 3 YEARS (2015,2016 & 2017) = AVE. US$ 4,114,248 X 87 % U.S. CLIENTS.**

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

BVC IS RENOWNED FOR ITS STRICT HUNTING POLICIES AND ENFORCES ETHICAL HUNTING PRACTICES BY ALL PHS. BVC USES A CORE OF REGULAR PHS WHOARE SELLECTED ON REPUTATION AND ETHICAL BEHAVIOUR.

BVC WAS THE FIRST OPERATION TO INTRODUCE AGE MINIMUMS FOR BUFFALO, LION AND LEOPARD AND WAS INSTRUMENTAL IN PUSHING FOR ZIM. PARKS TO ADOPT AN AGE POINTS SYSTEM TO CONTROL LION AND LEOPARD QUOTAS.

AS PART OF OUR POLICY BVC DOES NOT ALLOW ANY SHOOTING FROM A VEHICLE (OTHER THAN SMALL CATS AT NIGHT) – NO HUNTING WITHIN 1 KM OF ANY CAMP - NO HUNTING OR BAITING FOR CATS WITHIN 500 M OF A WATER POINT – NO HUNTING OUT OF LARGE HERDS – NO HUNTING OF BUFFALO OUT OF HERDS (RESTRICTED TO SMALL GROUPS OF DAGA BOYS) – NO SOFT TOP BUFFALO – NO LION PRIDE MALES.....NUMEROUS OTHER RULES WHICH A PH HAS TO ABIDE BY IF HE IS TO REMAIN ONE OF OUR REGULAR / CORE PHS.

ALL OF THE ABOVE IS WELL KNOWN TO ALL ZIM. PHS AND ALL CLIENTS THAT HAVE HUNTED ON BVC.

WE HAVE 7 YEARS OF DATA FROM RESEARCH CONDUCTED ON BVC FOR LION, LEOPARD AND HERBIVORES AND THIS DATA IS OFTEN USED AT WILDLIFE WORKSHOPS AND QUOTA SETTING MEETINGS.

WITHOUT DOUBT, THERE IS NOT ANOTHER ZIMBABWEAN HUNTING OPERATION THAT DOES AS MUCH FOR THE COMMUNITIES AS BVC AND AGAIN THIS IS COMMON KNOWLEDGE AND CAN EASILY BE VARIFIED.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: R.H. Leathem Title: General Manager

Ripple Creek
Fimbiri
Malangani
Towla
Nengo
Dyers
Chamalaya
Samanyanga
Lamulas
Mazunga
Ngali
Kwaluzi

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] SUPPLEMENT TO APPLICATION IMPORT SPORT-HUNTED TROPHY - LION ZIMB - BAKER, C

1 message

Emma C. Sampson <permits@conservationforce.org> Mon, Oct 28, 2019 at 12:12 PM
To: amy_brisendine@fws.gov
(b) (6)

October 28, 2019

TRANSMISSION VIA EMAIL: amy_brisendine@fws.gov
Department of the Interior
U.S. Fish and Wildlife Service
Ms. Amy Brisendine, Permits Biologist
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: SUPPLEMENT TO APPLICATION TO IMPORT A SPORT-HUNTED TROPHY
PRT #: MA27002D-0
APPLICANT NAME: CHARLES MARK BAKER

Dear Ms. Brisendine:

We are hereby submitting a supplement to an application because the hunt was completed successfully.

SPECIE: LION
DATE HARVESTED: 10/21/2019
PROFESSIONAL HUNTER: J. Sharp
OPERATOR: Mazunga Safaris
LOCATION: Bubye Valley Conservancy
COUNTRY: Zimbabwe

Attached please find copy of Zimbabwe Parks and Wildlife Management Authority to Process Special Permit for Hunting, Hunting Return Form – TRAS2, Application for Hunting NP/CITES, Zimbabwe Parks and Wildlife Management Authority Hunting Licence No. HOP 0062, Hunting Permit No. 19081 and Section A: Lion Hunt Return, issued on behalf of Applicant.

If you have any questions, please do not hesitate to contact us.

Enclosed:
1. Copy of Zimbabwe Parks and Wildlife Management Authority to process special permit
2. Application for Hunting issued on behalf of Mr. Charles Mark Baker
3. Zimbabwe Parks and Wildlife Management Authority License / Permit
4. Section A: Lion Hunt Return

Emma C. Sampson

Conservation Permitting Division
CONSERVATION FORCE
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

Baker, C Mark - LION docs.pdf
9430K

Lion,

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000082492
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Mazunga Safaris (Pvt) Ltd	**Client's Full Name**	CHARLES MARK BAKER
ZTA (HOP) No.	HOP0062	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	Bubye Valley Conservancy 8 Norfolk Road Bulawayo	**Address**	(b) (6) USA
Name of Professional Hunter	J SHARP	**Licence No.**	323
Telephone		**Fax**	NIL
Number of Accompanying Guests		1	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	COLLETTS WILDLIFE ARTISTRY	**Address**	15 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Shipping Agent	FREIGHT CONSULTANTS	**Address**	3 TROJAN STREET BELMONT, BULAWAYO
Name of Foreign Agent	TRACY SAFARI ADVENTURES	**Address**	(b) (6)

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Bubye Valley Conservancy	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	08-10-2019
Date of Safari To	26-10-2019
Daily Rate Charged For Big Game USD	3,000.00
Daily Rate Charged For Plains Game USD	700.00
Daily Rate Charged for Non hunting guests USD	300.00
Number of Accompanying Guests	1

ZPWMA
Date Stamp

Fee B27768

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Hunting Officer

Date: 25 September 2019

Ref: 150/18/H/SPNH

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Mazunga Safaris who have applied for permit to hunt 1 x lion with client **Charles Mark Baker** in the following property:

- Bubye Valley Conservancy in Bubi District Matebeleland South Province

The hunt will be **from 8 October to 26 October 2019** under the guidance of professional hunter J. Sharp PH license number 323.

Kindly find attached application from the operator and copies of 2019 hunting permit and quota.

Recommended/ ~~Not Recommended~~..... 30/09/19

Intelligence and Security Manager **Date**

Approved/~~Not Approved~~..... 30/09/19

pp **Legal Services Manager** **Date**

For and on behalf of Director General

Parks and Wildlife Management Authority
MANAGEMENT THROUGH CONSUMPTIVE
30 SEP 2019
HEAD OFFICE
P. O. BOX CY 140, CAUSEWAY, HARARE
TEL: (04) 707 624-91 792783-9

19081

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

Western Region

Cnr 15th Ave/Main Street
P O Box 2283
Bulawayo

Telephone : 263-9-63646-7
Bookings : 263-9-65592
Email : info@zimparks.co.zw

Head Office

Botanical Gardens
Cnr Borrowdale Rd/Sandringham Dv
P O Box CY 140
Causeway, Harare
Telephone : 263-4-707624-9
Fax : 263-4-708180
Website : www.zimparks.co.zw

NAME OF OPERATOR: MAZUNGA SAFARIS **LICENCE NO:** HOP 0062

NAME OF CLIENT: CHARLES MARK BAKER

ADDRESS: (b) (6) [redacted]

P H NAME: J SHARP **LICENCE NO:** #323

TRAZ NO: 82492 **HUNTING PERMIT NO:** 19081

TYPE OF HUNT: LION

AREA OF HUNT	PROVINCE	DISTRICT	SPECIES	K/W	SEX	LOC STAT UTM / UPS
BUBYE VALLEY CONSERVANCY	MAT SOUTH	BEITBRIDGE	LION	1K	M	207616

SPECIES: Lion **DATE KILLED:** 21:10:19

SPECIES: ..... **DATE KILLED:** .....

DURATION OF HUNT: 8 OCTOBER 2019 – 25 OCTOBER 2019 **HIRE OF SERVICE FEE:** $700

TROPHY SIZES: L 15 8/16", W 10 1/16" - 25 9/16"

PH SIGNATURE: [signature] **DATE:** 21:10:19

RANGER NAME: MARSHALL MAHUKU GU **SIGNATURE:** [signature] **DATE:** 21:10:19

DATE SUBMITTED TO OFFICE: **SIGNATURE:** ..... **DATE:** .....

In Harmony with Nature

SECTION A: LION HUNT RETURN

CHARLES MARK BAKER

1 TRAS 2 SERIAL NUMBER: 82492

2. HUNTING OUTFITTER: MAZUNGA SAFARIS

3 PROFESSIONAL HUNTER: J SHARP #323

4 PROPERTY/CONCESSION: BUBYE VALLEY CONSERVANCY

5 MINIMUM NUMBER OF DAYS BOOKED FOR LION HUNT: 18

6. i.) BAIT & BLIND [ ] ii) ON FOOT [✓] iii) HOUNDS [ ]

7. i) RIFLE [✓] ii) SHOTGUN [ ] iii) HAND GUN [ ] iv) BOW [ ]

8. i) SUCCESSFUL HUNT [✓] Iii) FAILED HUNT [ ]

Only complete questions 9-10 if a hunt was unsuccessful

9. WAS A LION WOUNDED DURING A FAILED HUNT: YES NO

10. IF HUNT FAILED, WHAT WAS THE REASON?

Complete 11-13 for both successful and unsuccessful hunts.

11. TOTAL NUMBER OF BAIT NIGHTS: 11

12. NUMBER OF LIONS RECORDED ON BAITS

SEX / AGE	Number	Evidence (sighting, tracks, trail camera)
Adult male	6	SIGHTING & CAMERA
Adult female	8	" "
Subadult male	11	" "
Subadult female		
Unknown	2 CUBS	" "

13. DATE HUNT STARTED: 08:10:19

Complete questions 14-19 if a Lion was shot

14. HOW MANY DAYS INTO HUNT WAS LION SHOT: 14

15. GPS POSITION: S21°31.884' E030° 10.776'

16. SKULL LENGTH (inches): 15 3/16"

17. SKULL BREADTH (inches): 10 1/16"

* Independent verification Y N (to be completed by ZPWMA)

18. ESTIMATED AGE OF LION TAKEN

i. < 4 years [ ] ii. 4-5 years [ ] iii.>6 years [✓]

19. SEX OF LION HUNTED [✓] (Male) [ ] (Female)

COMMENTS

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE
Date: 2020.08.13 14:58:05 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 27002D

JENNA KING Digitally signed by JENNA KING
Date: 2020.08.13 14:47:11 -04'00'

Enhancement Finding

Applicant: Charles Mark Baker (PRT– 27002D)

Introduction

Charles Mark Baker submitted an application, received by the Service on February 08, 2019, for the importation of one male lion *(Panthera leo melanochaita)* taken October 21, 2019, from the Bubye Valley Conservancy, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when the import activity qualifies for and the Service issues an ESA threatened-species

enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can

contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. If communities that

share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual

requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making ESA enhancement findings for the import of sport-hunted trophies of lions on an

application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

Hunting, Management, and Utilization of Lions

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Charles Mark Baker hunted in the Bubye Valley Conservancy (BVC) in Zimbabwe. Based on information submitted with the permit application, the Bubye Valley Conservancy (BVC) is reportedly one of largest private wildlife areas in Zimbabwe with a total area of approximately 3,400 km^2. The land that now occupies BVC was historically a cattle ranch, and in 1994 the BVC was established and land use converted through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting.

In evaluating whether the importation of Mr. Baker's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Bubye Valley Conservancy and Mr. Baker himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Save Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species.

Sport hunting was essential for the successful transition of the BVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the

conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over US $100,000 per year. The BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but it is also empowered by job opportunities created both within these communities, as well as in the BVC (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Bubye Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Baker's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Baker supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Baker, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Baker in the hunting and subsequent import of the trophy lion he harvested in the BVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Baker's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these

authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Baker's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Baker's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Baker, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, reportedly, USD 590,000 was spent on anti-poaching efforts by BVC alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Baker's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Baker submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Baker plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Baker's trophy lion increases the funds available to the Zimbabwe Government and BVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Baker's permit request, we find that the expertise, facilities, or other resources available to Mr. Baker appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Baker's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Baker's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Baker on October 21, 2019, from the Bubye Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Charles Mark Baker of Houston, Texas.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The hushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 11, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.13 12:09:15 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 27002D, Charles Mark Baker, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

Signature: AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.13 14:59:11 -04'00' Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA27002D-0
Effective: 08/14/2020 Expires: 08/13/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.14 08:07:02 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHARLES MARK BAKER
(b) (6)
HOUSTON, TX 77024
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2019 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2019 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

RCVD MAR 21 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
FRYER	KENNETH	B	M.D.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying as a business, agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
SAN LUIS OBISPO	CALIFORNIA	93405	SAN LUIS OBISPO	U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) [redacted] 3/12/19

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

SAME as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Kenneth Fryer

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☑ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Pantera Leo

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   SAVE Conservancy
   Zimbabwe, Africa
   See attached.

   b. Date wildlife is to be hunted:

   July 15, 2019 to August 5 2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Pro Safaris-Africa
   Louis Muller
   info@pro-saf.com

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   N/A

   b. Date wildlife was hunted:

   N/A

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

HAVE NOT Hunted YET.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Louis Muller owner Prof. Hunter ADAM Goosen
Business Name: PRO SAFARIS - AFRICA
Address: 20 HADDON AVE.
City: KHUMALO, BULAWAYO, Zimbabwe, AFRICA.
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

See attached

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

trophy fee for lion $35,000 if taken
Daily Rate 450.00 x 10.
See attached.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

See attached.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ (b) (6) [redacted] Date: 3/12/19

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

San Francisco, California
Broker: Copperomith

Carnivore Densities in the Savé Valley Conservancy

Results of the 2017 Spoor Survey & Wild Dog Monitoring Project

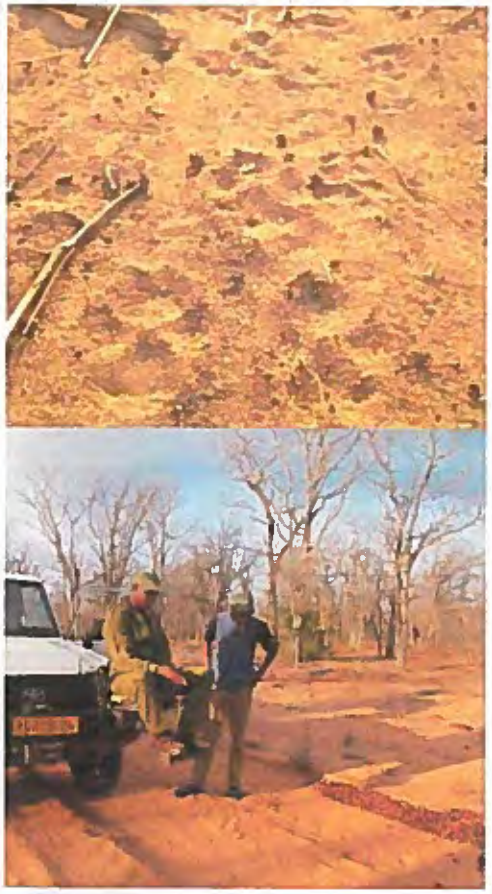
Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of carnivores within the Savé Valley Conservancy (SVC / the conservancy) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer.

Spoor surveys have been shown to be an effective and efficient means to assess wildlife densities (Stander 1998; Funston et al. 2001; Davidson & Romañach 2007; Funston et al 2010) with strong correlations existing between spoor density and true density. The technique is considered to produce reliable estimates for lions, spotted hyenas, and leopards, when sample sizes (spoor encounter rates) are sufficient. Other carnivores are included in our counts simply to monitor trends over time.

This report presents the results of the October 2017 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.



AWCF head scout, Rueben Bote, and attachment student, Nkosilathi Ngwenya, identifying spoor.

Methodology

The 2017 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of

sample area, 1km of transect was surveyed, creating a penetration density (expressed as a ratio of kilometres of transect surveyed to total sample area) of between 1:6 and 1:7.

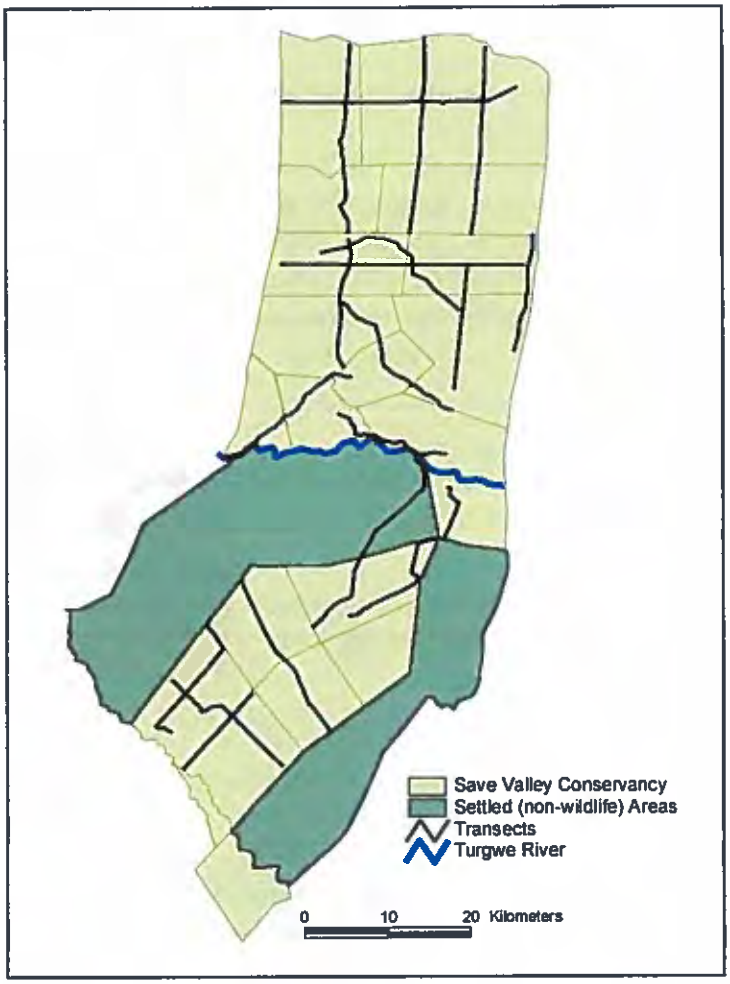
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.7 km, giving a penetration ratio of 6.31. In southern SVC, the combined transect length was 144 km, giving a penetration ratio of 5.56. For the conservancy as a whole, 403.7 km were driven (penetration ratio 6.04).

Transects surveyed were the same as those used in 2007-2017 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Bote, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.7 km and 29.2 km in length, with a mean transect length of 21.2 km.

Each transect survey started as close to sunrise as possible, and wherever feasible was driven from west to east to ensure the best possible tracking conditions. Only tracks less than 24 hours old were counted. Road conditions are generally sandy, such that spoor is relatively easy to see. Where possible, spoor of individual animals were followed to reduce the likelihood of that individual being counted twice on a given transect. Spoor was recorded for all mammalian carnivores bigger than a genet.

Figure 1. Map of the transects driven – October 2017



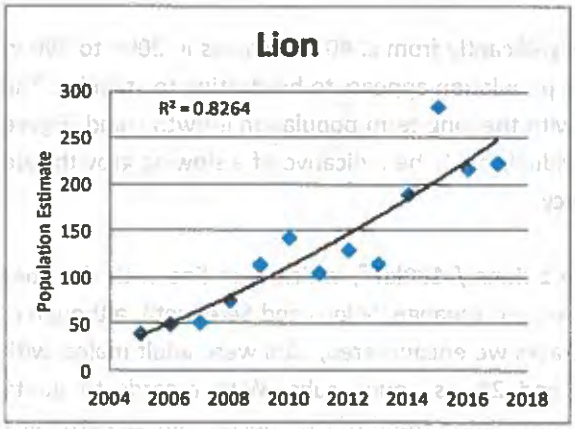
Results

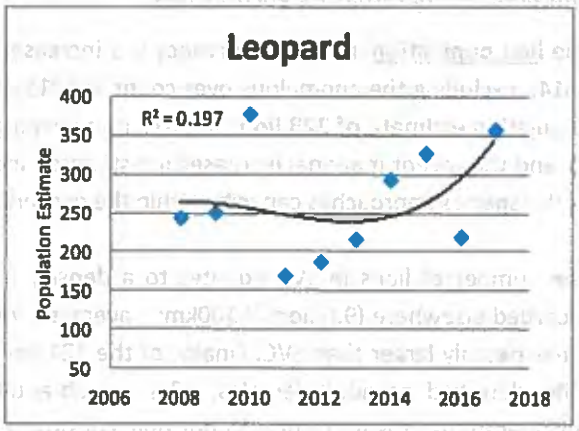
Table 1: Summary of survey parameters (2017)

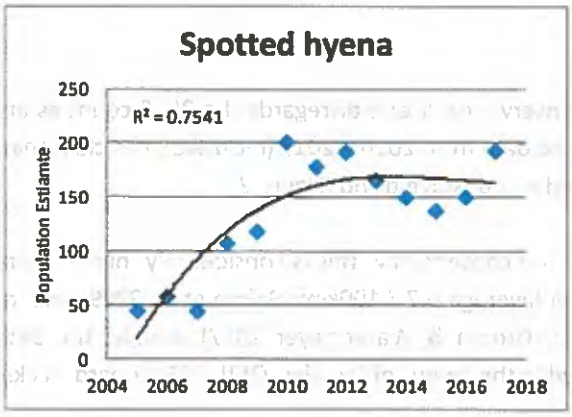
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

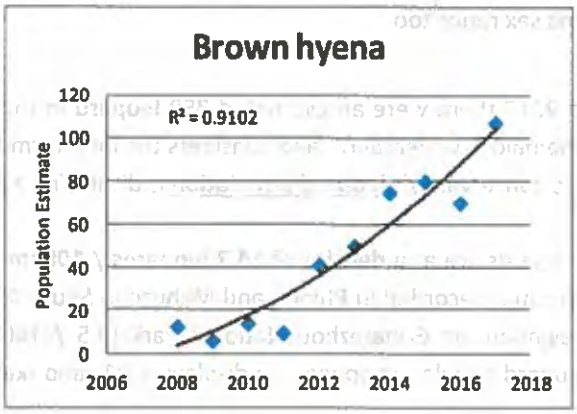
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs).

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223
Leopard				245	252	378	172	189	218	295	328	221	359
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193
Brown hyena				12	6	14	10	41	50	75	80	70	107
African Wild dog				45	60	64	61	86	90	81	91	99	94
Black backed jackal				188	190	157	141	151	199	229	241	234	296









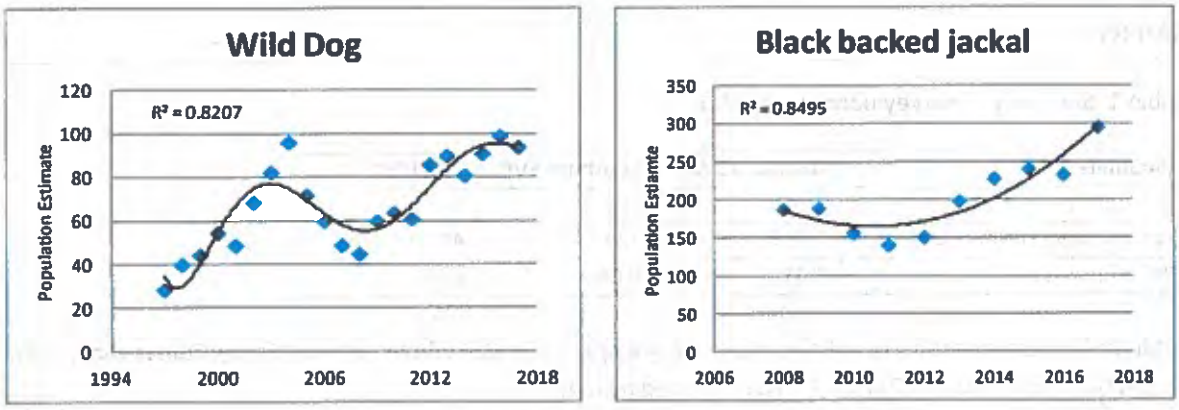


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

The results for each species are stable/increasing. The trend data suggests that 2016 was a slight undercount for all species (as was also the case in the Gonarezhou National Park survey), and that 2015 was most likely an over count for lion (and maybe for leopard).

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to be starting to stabilise. The population **estimate of 223 lions** in 2017 is in keeping with the long-term population growth trend (Figure 2), and the recent marginal increases in estimated individuals could be indicative of a slowing growth rate as the species approaches capacity within the conservancy.

The number of lions in SVC equates to a **density of 9.1 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 121 lion tracks we encountered, 31% were adult males, with 55% identified as adult females, 12% as sub-adults and 2% as young cubs. With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

In 2017 there were an estimated **359 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2010 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a good and positive trend (Figure 2).

Leopards are at a **density of 14.7 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (9.5 / 100km²; Groom & Watermeyer 2017). Finally, the SVC leopard population appears to displays a 2:1 ratio skewed in the favour of females. Of the 85 leopard tracks

we recorded, 32% were adult males, 64% were adult females, with one sub-adult (1%) being recorded and three cubs (3%).

Derivation of population estimates from spoor densities is controversial for leopards (there are several different equations available which give different numbers) so the numbers themselves should be treated with caution. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. There were an estimated **193 spotted hyenas** in 2017. The hyena population could be doing better in light of the recently stabilising lion population, but we will need to monitor the population to determine if a true trend is emerging. Likewise, one must not overlook that the possible causes of the recent slight population decline between 2012-2016 (prey availability, intra-specific competition, hunting pressure, anthropogenic mortality etc.) may still be of consequence.

Spotted hyena's are at a density of **7.9 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 9.7 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2017). Given the relatively lower density of the species in the conservancy, they may still increase more.

There were an estimated **107 brown hyenas** in the conservancy in 2017. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **4.4 brown hyenas / 100km²** in 2017, which is higher than the average (2.5 brown hyenas / 100km²) over the last few years (2012-2015).

The **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 94 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km²)**. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 313 wild dogs in the conservancy, with a density of 12.8 African wild dogs / 100km². This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

When counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time.

There has been a notable increase in the **black backed jackal** population in the conservancy, from an estimated 241 jackals in 2015 and 234 jackals in 2016, to **296 black backed jackals** in 2017. Overall, the jackal population is displaying a stable positive growth trend (Figure 2). The estimated density of jackals was **12.1 jackals / 100km²** in 2017.

We once again stress, that the spoor encounter rate for **cheetahs** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetahs, even with large confidence intervals. However, data from the spoor survey suggests there to be a minimum of **four cheetahs** in the whole

conservancy at a **density of 0.2 cheetahs / 100 km²**. This is on the low end of the spectrum when one considers the range of cheetah densities elsewhere (excluding highly managed fenced reserves in South Africa); for example, 0.2 cheetah / 100km² on Namibian farmlands and in the Sahara, and up to 2.5 cheetah / 100km² in the Serengeti National Park (IUCN/SSC 2015).

Although anecdotal evidence suggests the population may be picking up slightly, we can safely say the population is still very low (only two cheetah tracks were seen in the 403.7 km of transects driven). However, spoor surveys are not appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. **The Cheetah Conservation Project Zimbabwe, which collected updated photographic information on cheetah throughout Zimbabwe, estimates c. 12 adult cheetahs in SVC (van der Meer, 2016).**

Word of caution

When interpreting the results in the graphs and tables at the end, please do so with caution, especially to quote specific numbers. For lions and hyenas we are confident that these spoor surveys are relatively accurate in the numbers they predict, although anomalous over and undercounts can hinder this. Likewise, we can trust the numbers for wild dogs, as they are from the detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give different population estimates from each other. The spoor survey technique has not been calibrated for species like jackals, civets, even brown hyenas, so while the data is useful for looking at trends, using population figures directly from the graphs for these species is unadvisable.

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Groom, R. & Watermeyer, J. 2017. Carnivore Densities in Gonarezhou National Park: Results of the 2017 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. 1998. Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Van der Meer, E. 2016. The cheetahs of Zimbabwe, distribution and population status 2015. Cheetah Conservation Project Zimbabwe, Victoria Falls, Zimbabwe.

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Appendix 1: All Spoor Survey Results for All Species Counted (2017)

NORTH SVC Species	Survey Area North SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	1639	278.042434	Leopard (Y=0.6993X)	16.96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011
Brown hyaena	1639	92.3646238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484
Cheetah	1639	3.848525992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369
Civet	1639	759.0999784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569
Honey Badger	1639	119.1610431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147
Leopard	1639	291.2825499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916
Lion	1639	188.5777736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906
Spotted hyaena	1639	138.5469357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727
Wild dog	1639	277.0938714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453
African Wildcat	1639	22.06685984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421

SOUTH SVC Species	Survey Area South SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	800.57	27.21437644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111
Brown hyaena	800.57	16.95095785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0
Civet	800.57	233.2660838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667
Honey Badger	800.57	3.887768063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.694444444
Leopard	800.57	73.86759319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.19444444
Lion	800.57	38.98720305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.97222222
Spotted hyaena	800.57	55.9381609	Lion (Y=0.3049X)	6.987291667	144	33	4.363636364	144	5.559513889	22.91666667
Wild dog	800.57	44.0724904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	0

TOTAL SVC Species	Survey Area Total SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	2439	295.7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862
Brown hyaena	2439	106.8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429
Cheetah	2439	3.684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389
Civet	2439	980.1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714
Honey Badger	2439	118.2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448
Leopard	2439	359.11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904
Lion	2439	222.8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204
Spotted hyaena	2439	193.4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293
Wild dog	2439	313.1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808
African Wildcat	2439	21.12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473

The Savé Valley Conservancy Lion Management Plan, 2011

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Executive summary

Although lion populations in African savannas are generally declining, there are several examples in southern Africa where lions have been reintroduced to private land, and where due to the protection afforded, are increasing in numbers. Although increases are typically a desired management outcome, inevitably most reserves reach a point when management decides that there are now sufficient lions to meet the reserves objectives, necessitating population control measures. Population control of lions does, however, often create management dilemmas as it is not always clear what approach will work best given the specific set of circumstances and budgetary constraints. In order of seeming preference the measures typically employed to control lion populations include a) translocation of subadults to new reserves, b) contraception of breeding lionesses, c) culling (including trophy hunting), and d) social manipulation.

All of these management options require a degree of population monitoring, which is often more costly than the management intervention itself. Although excess subadult, and even adult, lions could be removed from the Savé Valley Conservancy, it is not clear that there are any immediate destinations that would be suitable for these animals to be reintroduced into. Thus translocation, although useful, is not likely to remove sufficient lions to be

considered as a key approach for the conservancy. Contraception can be successfully applied in small reserves where resources, habitat and lion behaviour allow intensive monitoring and the manipulation of breeding rates. However, currently in the conservancy the degree of lion monitoring precludes contraception being considered as the main approach to population regulation.

As the numbers of lions in many southern African reserves have reached saturation, now days many reserves are faced with the need to cull lions. Typically this is achieved through the shooting of excess independent subadults, male coalitions, and occasionally lionesses from prides. The latter option is problematic in that it induces fear in the lions and thus affects game viewing opportunities. Few reserves are large enough for more natural population regulation mechanisms to be applied, but these can be simulated on most. Logically population control methods that simulate natural processes are likely to produce the most desirable outcome, with the minimum intervention, and thus minimum social disruption. Social disruption *per se* is a fourth population management approach the can be applied but is generally avoided because of how it may affect the tourism value of lions in many reserves.

Thus although all feasible approaches to lion population control should be investigated, currently culling, ideally as a trophy hunting exercise, is the most suitable option for the Savé Valley Conservancy. However, the lion population in the conservancy is large enough that a culling approach whereby lions of the appropriate sex and age are trophy hunted may be sufficient to induce population stability without having to resort to a more generalised culling approach. To date the aim for trophy hunting lions in the conservancy has been economic, with population management recently having become an additional objective. The challenge for conservancy management is to reliably set an off take or quota that meets the economic expectations and effectively limits lion population growth.

The basis of this plan draws on research findings that indicate that lion populations are more resilient to trophy hunting when only adult male lions are hunted. However, it is possible that stabilizing lion population growth when they have not reached carrying capacity may not be achieved through sustainable use models based on only hunting mature males. Thus it is likely that female lions will have to comprise a proportion of the quota to effectively limit population growth. Using this premise lion hunting in the conservancy could be manipulated in the following ways to maximise hunting returns while effectively limiting population growth:

1. Hunting male lions at an age threshold that will stabilize population growth
Although infanticide by adult male lions can increases the risk of population extinction, trophy hunting can be sustained simply by hunting males above a minimum age threshold. This strategy can maximize both the quantity and the quality of the long-term kill. Thus any

male older than five years of age can be safely hunted without negative effects on the population. This is proposed as the key lion population management tool to be employed in the conservancy.

2. Hunting males out of male coalitions that are large or defend key territories

Male lions reach peak reproductive success (as measured by the number of offspring surviving to 2 years of age) at 8 years of age. But males ≥ 7-8 years of age are the most suitable age class for high quality trophies. However, in certain circumstances very large coalitions acquire territories at 4-5years of age. These coalitions can usefully be reduced in size by hunting males out of them, which may delay the age at which they breed.

3. Hunting lionesses in areas where there has been a history of conflict

By monitoring problem animal reports it should be possible to identify areas of the conservancy that are particularly prone to these issues. While it is not advocated that problem causing lions are hunted as trophies, it could be useful to proactively hunt either subadult lionesses or lionesses from small less important prides in these areas. This intervention could reduce the future risk of livestock killing, but alleviates to possibility of unnecessarily classifying any lioness as a problem animal in order to get an allocation to hunt. In terms of problem animal control, sometimes repeat offending lions or lionesses are best shot to resolve conflict problems. For the reasons given, however, it is not suggested that these problem animals are trophy hunted. They should preferably be destroyed by conservancy members in collaboration with conservancy management.

4. Hunting older females from key prides

Although it has been reported in the literature that hunting lionesses can lead to population declines, there are natural scenarios that induce adult female mortality that could be simulated to control lion population growth in the conservancy. Lionesses in large dominant prides sometime kill lionesses from neighbouring prides in territorial fights. But in a population below carrying capacity one might expect fewer territorial fights. Thus one might simulate the 'predatory effect' of neighbours. Thus females to be hunted should be selected from less important prides keeping the nucleus of the dominant prides intact, especially if that meets emerging photo tourism objectives. Dominant prides typically occupy territories including multiple river intersections and have large resident herds of buffalo.

For the seasons 2012-2014 it is proposed that all male lions of five years or older are placed on quota, and that some lionesses are additionally placed on quota. This should equate to a male quota of at least eight males, and 3-5 females, per year. The outcome of this should be monitored by annual spoor surveys, a second conservancy-wide lion census in 2015, and a radio-tracking based monitoring program for the next three years. The objective of the radio-tracking study will be to try and determine the effects of this hunting strategy on key

demographic patterns. The off take strategy for lions in the Savé Valley Conservancy should be supported by the following activities:

1. Lion populations should be monitored via spoor counts, manager's estimates and for the next three years via radio-tracking and direct counts compiled during an annual workshop to help set the following year's quota.
2. Long-term records of quotas, number of licenses issued, and off take should be maintained and reported by the conservator on annual basis.
3. Measurements of lion skull size as well as body size should be recorded according to the guidelines specified in Appendix 2 of this plan for all lion shot, and where possible the individual should be identified by reserve management to assure all involved that an appropriate lion was shot.
4. Trophy age should be assessed by a combination of tooth development and wear, nose pigmentation, mane development, etc (see Appendix 2).
5. Hunters should record locations as accurately as possible of all lion shot using a GPS with records going to a central database to monitor intensity of use of certain areas.
6. The professional hunters should adhere to high ethical standards in terms of what is fair chase and in trophy selection.
7. Safaris should not be marketed to clients as "sure things," to relieve professional guides somewhat from pressure at having to deliver a lion, regardless of quality.

Problems with the implementation of any lion management plan, however, include the fact that lions are difficult to census and available techniques are prone to statistical problems. These issues of population monitoring can be resolved in four ways with increasing levels of certainty and cost, from surveys of landowners and managers to get estimates of population size and structure, to long-term direct monitoring. It is proposed that manager surveys (manager estimates) and track frequency estimates are conducted annually, and that the call-in survey conducted in June/July 2011 be repeated in 2015. However, it is also important to secure funding for long term direct monitoring. Additionally careful monitoring of hunted lions should be mandatory (see Appendix 1). Based on the respective recent surveys there currently seem to be about 170 lions in the conservancy, as detailed in the table below.

Survey method used	SVC lion population estimate
Spoor estimate from 2010	148
Call-up estimate	168 (95% confidence limits: 128-207)
Managers estimate	162

An additional concern is the management of livestock predating lions. Although more comprehensive details are presented in the plan, the two key issues to address with all stakeholders to reduce conflict are that:

a. All grazing livestock should be accompanied by a herder and at least two dogs and donkeys that are wary of lions (and other predators).
b. All livestock should be kraaled at night in lion proof bomas (at least 6 foot high and non-see-through) with at least two herders (owners) and two dogs in attendance.

If these fairly simple measures are in place relatively few conflict situations will arise. The appropriate materials for boma construction vary from site to site, but in the conservancy there should be no shortage of mopane trees for stout pole boma constructions, augmented by old fencing materials (see page 7, 10 and 21 of the toolkit). One of the key weak points in bomas is the gates. Corrugated iron, or flattened oil/diesel drums, can be fashioned into useful and effective gates. Dogs are key to the success of most mitigation measures (see page 16 and 17 of the toolkit), but must be vaccinated to avoid disease transmission. Conservancy members should lobby the authorities in the area for comprehensive vaccination of all dogs.

It is also important to reach out to the communities to assist in educating about predators and how to live with them, and for creating awareness and better attitudes generally (see pages 26 to 31 of the toolkit). Existing outreach programs by various conservancy constituencies should be supported by conservancy members and by a conservancy conservation fund.

All livestock predation events should be well reported and any interventions should follow a protocol best established in a work shop process with all stakeholders involved. While habitual livestock killing lions might best be destroyed, this should only be done when other mitigation measures have been attempted, and should not be used as a trophy hunting opportunity. Thus all destruction of problem lions should be undertaken by conservancy members and staff.

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1. Introduction

Lions are a powerful cultural symbol of Africa, and an important indicator of an area's wildness. Lions are also a key species for photo-tourism, safari trophy hunting, and research. As a key member of the Big Five they form an integral component of the classical African hunting safari. However, lions are increasingly threatened, with much of their former range now lost. Where lions still survive, they can be a major predator of domestic livestock, presenting challenges and hardship to those who live amongst them. Thus whilst lions are a major source of economic benefit being one of Africa's most important tourism attractions, they can also be an economic and dangerous liability.

In 2002 the Zimbabwe lion population was estimated to be between 1,000-1,700 animals (Chardonnet 2002, Bauer and Van der Merwe 2004,) with an estimated range of c. 90,000 km^2. However, to date information on population status, current distribution and trends still remain lacking for most major wildlife areas in Zimbabwe, although there are estimates of numbers for some areas. Lion specific surveys and research have largely been limited to national parks and wildlife estates, notably Hwange National Park, the Matetsi Safari Area in northwest Matabeleland, and Mana and Matusadona National Parks in the Zambezi Valley (Monks 2005). In the south-east lowveld lions have been monitored in different areas using a combination of track frequency counts, call-in surveys, and direct monitoring. Track surveys have been conducted in Savé Valley Conservancy from 2007-2010 (Groom 2008-2010). Call-in surveys have been conducted in Gonarezhou National Park (Groom & Funston 2010, Groom & Funston in prep) and sporadically in Savé Valley Conservancy from 1996 to 2007 (Pole 1999; Pole 2003), and lions have been directly monitored in Malilangwe.

Previously in this region lions were largely extirpated by cattle ranchers and until quite recently were only resident in and around Gonarezhou National Park. They did, however, re-colonise the Savé Valley Conservancy in about 2000, and have been increasing ever since. The recent rate of recovery has fuelled concerns about the impact on various ecological and economic processes, necessitating a comprehensive management plan with appropriate options.

1.1 Savé Valley Conservancy

During the 1980s and 1990s game ranching developed as a major land use in the south-east Lowveld of Zimbabwe. In several areas, ranchers cooperated to form large collaboratively-managed wildlife areas, or conservancies. The most notable example of this was the 3,450 km^2 Savé Valley Conservancy, created in 1991 from 18 former cattle ranches (Figure 1). The natural land cover is deciduous woodland savanna dominated by *Colophospermum mopane,* Acacia-Combretum woodland and *Acacia tortillis* woodland (Pole 2004). Following a bad drought in 1991/1992, most of the conservancy's cattle were removed and the focus shifted

to development of multi-use wildlife production systems based on high quality tourism (Pole 1999). All internal fences were removed and a double 350 km perimeter game fence was constructed around the perimeter of the conservancy. Today, the conservancy comprises 23 individual properties, constituting 18 management units.

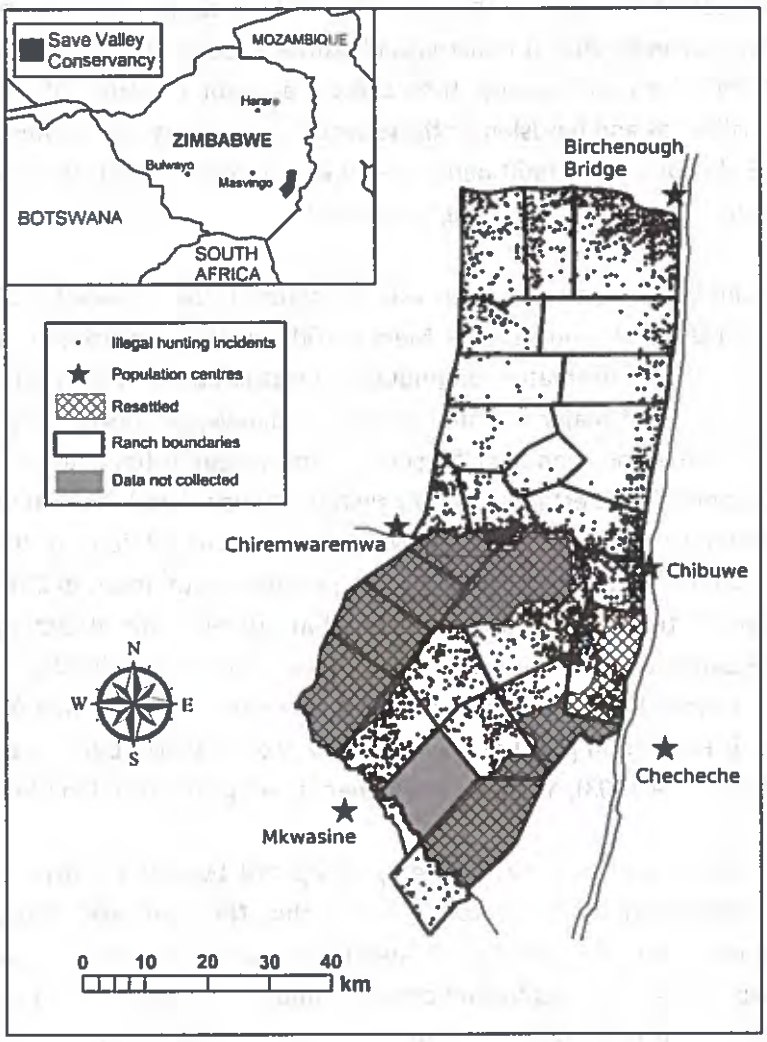

Figure 1. Map of the Savé Valley Conservancy highlighting settled land and the distribution of illegal hunting incidences from 2005 to 2009 (from Lindsey *et al.* 2010)

Prior to the development of the area for cattle ranching in the 1920's, the Savé Valley was one of Zimbabwe's major wildlife refuges (Pole 1999). To facilitate the development of the cattle ranching industry, however, almost all predators and most large herbivores were virtually eradicated. This included wild dogs, lions, cheetahs and spotted hyenas, with leopards managing to exist at reasonable densities (du Toit 1994, Pole 1999). When the conservancy was formed, 3,950 animals of 14 species were reintroduced and a security system was established, including ranch-based anti-poaching teams to control illegal

survey. On 7 May 2007 tracks of two male, three female and two-three cubs were seen at B3-trough (C10) and were named the Makonde pride. By September 2007 it was estimated that the lion population on Sango stood at about 24 lions."

Track index surveys conducted from 2007 to present indicate that lions in the conservancy are currently undergoing exponential population increase (Figure 2, Groom 2008-2010). It is thus clear that the numbers of lions are increasing rapidly, and may yet double in numbers before reaching equilibrium. Financial assessments suggest that this would not be a viable situation (Funston, Groom & Lindsey *in prep*) and thus some population control mechanisms are desired by the landowners. This could be effectively achieved through trophy hunting, although some consideration may need to be given to the large female segment of the population.

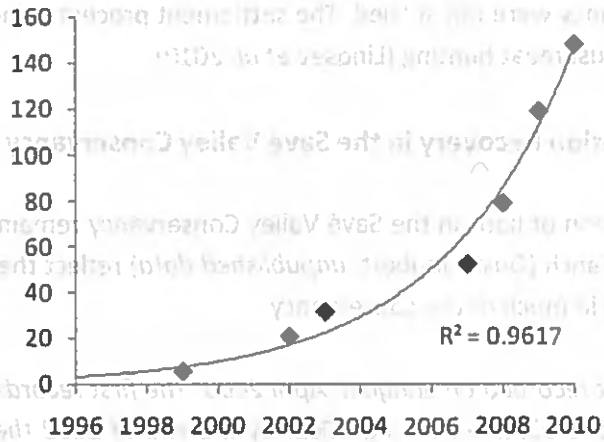

Figure 2. Rate of increase of lions in the Savé Valley Conservancy from 1996 to 2010 as determined by call-in and track index surveys. Average growth rate is 35%$^{-year}$

1.3 Background to Conservation and Modern-Day Trophy Hunting of Lions

Large carnivore species, including lions, are becoming increasingly threatened in Africa, especially when not protected in large conservation areas (Woodroffe & Ginsberg 1998). Fortunately, the popular appeal of charismatic carnivores such as lions has often led to the conservation of habitat that sustains a host of other species. In southern Africa, game reserves and game ranchers recognize the importance of maintaining lion populations and in some game reserves lion populations have been re-established to attract tourists and hunters (Anderson 1981, Mills 1991, Van Dyk 1997, Hunter 1999, Hoare & Williamson 2001, Funston 2008).

Photo-tourism and safari trophy hunting are two industries that have developed to create revenues whilst maintaining wildlife and wild lands. Although these industries differ considerably in their use of wildlife, it is clear that both can help to maintain parks, reserves,

hunting. Wildlife abundance and diversity increased rapidly during the 1990s, as did financial returns from photographic tourism and safari trophy hunting (Lindsey *et al.* 2008). Since the formation of the wildlife conservancy, however, predator numbers have increased, largely through natural recolonization (although 13 lions were reintroduced between 1995 and 2005). Nonetheless, and despite no eradication attempts since 1991, lion and spotted hyaena densities in the conservancy remained low for several years (see Pole 1999), and only began increasing significantly in 2007/2008.

The conservancy's positive development trends were, however, reversed in 2000-2001 with the onset of national land reform in Zimbabwe. Nine properties in the south of the conservancy (comprising 33% of the total land area) were settled by subsistence farmers, and approximately 80 km of 2m twin perimeter game fences was removed. Properties in the north of the conservancy were not settled. The settlement process coincided with the onset of large scale illegal bushmeat hunting (Lindsey *et al.* 2010).

1.2 Lion Population Recovery in the Savé Valley Conservancy

The initial recolonization of lions in the Savé Valley Conservancy remains sketchy. However, records from Sango Ranch (Dusty Joubert, *unpublished data*) reflect the pattern the process is likely to have taken in much of the conservancy:

"Lion tracks were first recorded on Sango in April 2000. The first records all seemed to be of males, with three males observed during 2001. By the end of 2002 the tracks of five male lions were known, but as yet no females had been identified. However tracks of female lions were recorded in the Bedford Block in 2003. In 2003 a male and female lion were recorded on Mokore Ranch. This lioness was reported with cubs on Mokore in 2004. On 18 August 2005, ten lions (4 lionesses, 6 small cubs) were captured at Malilangwe Conservancy and released on Sango Ranch. These lions remained for approximately two weeks in the Chanurwe hill area, and were driven away by a male and female lion that was now moving regularly along the B-line. The newly released lions moved to Chisangaurwe hill where they would hide in the day and hunt in the Savé River area during the night. On 18 November 2005 two of the 10 lions were found dead in snares with a third lion that had broke the snare. This had a devastating effect on the pride with the remaining lions splitting up. It is not clear how many lions survived but it seems from sightings and track records that three adult females and one cub remained. Over the next few years the lions on Sango increased to about 10 individuals by 2007.

In April 2007 a lion monitoring census was conducted throughout in the conservancy. Two methods were used to determine the number of lions in the area. The first being the call-up method with a tape played of a dying buffalo calf, while the second was a track count

wildlife, and the communities around them (Wilkie & Carpenter 1999, Lindsey *et al.* 2006). Although photo-tourism is generally perceived as less invasive, and therefore seems more in line with conservation efforts, hunters spend substantially more money towards their safaris and generate high revenues that can be used to support wildlife conservation (Wilkie & Carpenter 1999, Lindsey *et al.* 2006). Due to political instability safari trophy hunting, and meat sales from shot animals, currently generates most income in the Savé Valley Conservancy, although some landowners have expressed interest in attempting to shift their economic activities towards photo-tourism.

In Africa, safari trophy hunting generally occurs in areas not suitable for other livelihoods, such as farming or photographic tourism, and generates considerable revenue for land that would otherwise be considered of marginal value (Kiss 1990). The wealthy foreign elite have continued to demonstrate "willingness-to-pay" for the opportunity to hunt. If harnessed responsibly, this motivation may prove to be both an economically and biologically sustainable solution for making wildlife pay for itself (Child & Child 1990, Eltringham 1994). However, this "use-it-or-lose-it" philosophy (Baskin 1994, Kock 1995) is not without its critics (for a review see: Lavigne, Callaghan & Smith 1996). Central to the arguments against hunting is the notion that profit-oriented short-term gains go largely to an elite few at the expense of the masses and increase the risk for over-exploitation. Therefore, given that some target species are especially vulnerable to over-exploitation, in large part due to their life histories (e.g. lions), relative demand by trophy hunters, and economic potential, it is critical that they be managed conservatively and responsibly in order to assure their future existence.

As one of the principal attractions for safari hunters, lions are economically important to the hunting industry. However, a high risk of infanticide associated with the removal of resident males, combined with high demand, unsustainable quotas, and an industry plagued by mismanagement, make lions particularly vulnerable to over-exploitation (Whitman 2002, Yamazaki 1996, Loveridge *et al.* 2007, Packer *et al.* 2009, 2011). For these reasons, lions have a high "extinction potential". This easily sets up a situation of "killing the goose that lays the golden egg" when profit-oriented short-term gains become the driving force behind lion management, rather than sustainable quotas and long-term conservation. Likewise, because harvesting a socially complex species, such as lions, may result in unforeseen cumulative effects, traditional models used for the harvesting of ungulates may be misleading to even the well-intentioned manager, if not at odds with sustainable use (Whitman & Packer 1997, Greene *et al.* 1998).

Currently, only a few scientific studies have examined the extent to which sport hunting affects lion populations (Zambia: Yamazaki, 1996; Tanzania: Creel & Creel 1997, Whitman & Packer 1997, Whitman *et al.* 2004; Zimbabwe: Loveridge *et al.* 2007), and the long-term management implications from an economic or biological perspective have yet to be fully

understood (Whitman 2002). In order to effectively hunt lions within an area, without causing negative impacts on the population, it is imperative to study populations to determine the status of the individuals within the local prides (Whitman & Packer 1997).

Lions tend to be relatively resilient in recovering from population declines, and even catastrophic events, when conditions are good. For example, in the Serengeti National Park, after experiencing a particularly virulent form of canine distemper in 1994-95 that killed approximately 30% of the population, the lion population was fully recovered within a few years (Packer *et al.* 1999). Similar recoveries were recorded in the Kruger National Park after intensive culling programs (Smuts 1976, 1978). However, despite a lion population's ability to recover quickly, local population reductions and extirpations are not uncommon and may result from a combination of a number of factors: illicit game meat hunting, civil unrest, human encroachment, problem animal control, habitat loss, and unsustainable trophy quotas, to name a few. By targeting specific individuals based on their social status, safari hunting could however become a useful management tool to facilitate and maintain population growth and management.

Furthermore lions are also known to affect populations of prey (Mills & Shenk 1992) and smaller carnivore competitors, such as the African wild dog (Mills & Gorman 1997) and cheetah (Kelly & Durant 2000), adding to the uncertain future of several endangered species. Additionally nomads, dispersing subadults and resident lions often become problem animals creating conflicts with farmers and local people.

Large carnivores frequently symbolise Africa's wilderness to the general public who support their relocation or reintroduction. The lion holds a deep emotional appeal to the general public and is the single most sought-after species for tourists visiting reserves. Revenue from increased eco-tourism to South Africa is viewed as a potentially lucrative alternative to either hunting or subsistence and intensive farming practices, which are usually at odds with wildlife. As a result, government and private landowners in South Africa are attempting wildlife reintroduction projects on a scale that is not occurring anywhere else in Africa (Hunter 1999, Funston 2008).

2. Motivation for Trophy Hunting Lions in the Savé Valley Conservancy

To date the main aim of hunting lions in the Savé Valley Conservancy has been to raise revenue. From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year^{-1}), yielding gross income of US$912,900 (US$182,580 year^{-1}). Currently the conservancy has a lion population of similar density (160 lions = 6.9 lions/100 km^2) to similarly vegetated areas in northern Kruger National Park with medium prey density (Ferreira & Funston 2010). However, projections based on prey biomass suggest further increase can be expected. Being surrounded by communal settlement areas the conservancy is a net source for lions in

viability of this population, and its resilience to limited sport hunting of adult males. However, a limited off take of adult lionesses (<3%) should be sustainable (Van Vuuren *et al.* 2005).

Although adult females are crucial members of the population, consideration should also be given to the effect that mortality of pride males might have on the survival of age-classes that are vulnerable to intra-specific competition or conflict, namely dependent cubs that are susceptible to infanticide. The most important shortcoming of most models thus far is that they are unable to monitor or detect socio-ecological changes in the population (Van Vuuren *et al.* 2005), which may be of particular importance if lion persecution were to cause changes in social behaviour (Yamazaki 1996, Whitman & Packer 1997). This has largely been overcome in a model published by Whitman *et al.* (2004), which shows that although infanticide increases the risk of population extinction, trophy hunting could be sustained simply by hunting males above a minimum age threshold, and this strategy maximizes both the quantity and quality in the long-term. Whitman *et al.* (2004) conclude that any males ≥ 6 years of age can be safely hunted without negative effects on the population. This figure, however, is being widely debated as being too young, and may represent the market forces in the country (Tanzania) where the research was conducted.

The mechanism by which the loss of mature males is thought to influence the population is that it may result in an increased rate of young cubs succumbing due to the pride being irregularly guarded by the fathers (Loveridge *et al.* 2007) or infanticide when new adult males become the pride owners (Schaller 1972, Packer *et al.* 1988), ultimately having a detrimental effect on the growth of the population (Starfield *et al.* 1981, Whitman & Packer 1997). Thus the role of the territorial males in defending their territories against other challenging males, and the protection they afford their offspring, should not be dismissed. While it is possible as suggested by Whitman *et al.* (2004) that younger males can impregnate lioness, the experience and maturity of adult males may be very important for successful rearing of cubs.

In areas depopulated of mature males the remaining mature males cover very large areas incorporating several prides (Yamazaki 1996, Loveridge *et al.* 2007). This obviously reduces their ability to effectively defend their prides ranges, and results in average pride size, as measured by the number of lionesses, declining to ≤ 3, as well as cub survival declining to low levels (Loveridge *et al.* 2007). Packer *et al.* (1988) showed that prides of 3-10 adult lionesses have a higher individual fitness than smaller or larger prides, and thus prides reduced to <3 adult females have lower probability of persisting.

Adult males in the Selous Game Reserve, Tanzania, were shown to be able to sustain sport hunting that removed between 2.7 and 4.3 percent of the population annually (Creel & Creel 1997), while the removal of 10 to 16 percent is suggested to be unsustainable in the

the area, and is no longer a sink for dispersing lions from other areas. Therefore, the population needs to be managed as a distinct population, largely isolated from other populations, but still with the possibility of genetic material coming in from other areas. As a source area, with dispersal of animals to surrounding areas, trophy hunting may be an appropriate management tool to reduce conflict with adjoining land users by targeting specific males before dispersal and possibly small prides in high conflict areas (Venter & Hopkins 1988). In fenced reserves in South Africa intensive removals of dispersing lions are routinely done to reduce the risk of lions breaking out into communal areas (Van Dyk 1997) and to control population growth (Kettles & Slotow 2009).

3. The Potential of Safari Hunting to Impact Lion Populations

Literary sources indicate that excessive safari hunting of lions has the potential to negatively affect lion populations (Yamazaki 1996, Whitman 2002, Loveridge *et al.* 2007, Groom & Funston in prep), especially when lion quotas are large in relation to population size and animals taken from the population are in the early part of their reproductive prime. It is, however, very important that this impact is measured appropriately, and that the results of various data analyses are carefully interpreted. For example, professional hunters throughout Africa generally suggest that "suitable" trophy males appear to be declining in many areas over the last few decades, which may in many cases be true (Yamazaki 1996, Loveridge *et al.* 2007), and may serve as an index of a negative trend within the population. However, it would also seem that immature males are often easier to find because they readily scavenge from baits and are often less wary than older males, thus making them more vulnerable to hunters (Whitman 2002). This could thus in part account for the higher proportion of substandard trophies exported from Africa each year.

The sex and age of the lions hunted is thus important when assessing sustainability. The importance of adult survival for population growth has been reported for numerous moderate- to long-lived (k-selected) animal species (Wu & Botkin 1980, Crouse *et al.* 1987, Caswell 1989, Crooks *et al.* 1997). Since adult survival acts upon individuals with the highest reproductive value repeatedly, changes in this demographic rate are likely to strongly affect population growth. Van Vuuren, Herrmann and Funston (2005) using a deterministic spreadsheet model, found that adult female survival is the most important factor influencing population growth, and that human-livestock-conflict accounted for significant numbers of adult lionesses being shot each year in areas adjacent to the Kgalagadi Transfrontier Park. Loveridge *et al.* (2007) showed that persistence of boundary prides in Hwange National Park is negatively affected both by excessive adult mortality through hunting, as well as adult female mortality through sport hunting and human-livestock-conflict. It would thus seem that the frequency of adult lioness mortality a particular lion population is exposed too might be decisive in forecasting its long-term viability. Until recently lionesses were not hunted in the conservancy and as such this strongly increase the

long-term (Starfield *et al.* 1981, Venter & Hopkins 1988) in a closed population. In Zimbabwe a quota of 8% of the male population (Martin & Thomas 1991) has been shown to be difficult to sustain (Loveridge *et al.* 2007), although it is debatable whether the starting populations were accurately estimated. Thus it appears that adult males are more resilient to trophy hunting than are adult females, and that off takes of about 5-10 % per year of the adult males in the population are probably sustainable provided that the individual lions are selected carefully (Starfield *et al.* 1981, Venter & Hopkins 1988, Whitman *et al.* 2004).

The challenge that management is thus confronted with is to reliably estimate population size and structure and set a sustainable off take. This is, however, more complex in a reserve such as the SVC, which also supports a sizeable ecotourism sector incorporating safari lodges and photo-tourism vehicle safaris, for which reliable and satisfactory sightings of species such as lions are paramount.

4. Lion Survey Techniques to Determine Quotas

Conventional census techniques are inappropriate for estimating numbers of nocturnal, low-density carnivore species such as lions. The difficulties include that due to their cryptic shy nature, and because many lion areas are wooded further reducing visibility (Norton-Griffiths 1978), which makes aerial censusing inappropriate for lions. Furthermore in areas where lions are intensively hunted they are more likely to be shy, affecting most censusing techniques (Whitman 2002, Funston & Janse van Rensburg 2003). The best method to obtain a reliable population count and demographic assessment of a lion population is via a direct count, whereby each individual in the population is identified and counted. Packer *et al.* (1999) clearly demonstrates the benefits of using individual identification in terms of tracking population fluctuations in the Serengeti over 30 years. However, direct counts are generally not only prohibitively expensive and time consuming, but are also potentially impractical for anything but small areas.

Once direct counts have been discounted for surveying the size of a specific lion population can be effectively determined through total counts using a baited call-up station methodology, as developed by Smuts *et al.* (1977). Mills, Juritz & Zucchini (2001) developed a calling station method (limited time without bait) for censusing spotted hyaena (*Crocuta crocuta*), which has been adapted for censusing lions (Ogutu & Dublin 1998, Ferreira & Funston 2010). Call-ups surveys are generally conducted by broadcasting hyena vocalizations at a kill and/or wildebeest or buffalo distress calls across loudspeakers, and are useful at estimating lion numbers (Mills, 1985; Creel & Creel, 1997; Ogutu & Dublin, 1998, Ferreira & Funston 2010). Calling stations rely on a single, independent experiment to estimate the probability of the response to sounds, which might be different for different regions (Loveridge *et al.* 2001). Thus, call-ups have not yet been clearly shown to be effective for censusing lion populations in all situations, and may be biased by lion response

probabilities being variable as well as by poor experimental design or incorrect analysis. Response to call-ups seems to be particularly low in low-density (Funston 2001) and trophy hunted lion populations (Whitman 2002, Funston & Janse van Rensburg 2003). Furthermore, the effective luring range for predators varies considerably with regards to the vegetation density, topography as well as the season. Smuts *et al.* (1977) suggested that the dry season is definitely the best time of the year to carry out surveys.

There have been recent advances in using track frequency as an index to estimate lion density (Stander 1998, Funston & Ferreira 2010). The Savé Valley Conservancy is a good site for this monitoring technique as it largely has suitable road substrate, available tracking skills, and the possibility of accurate direct counts. As will be presented below it is likely that the combined knowledge of safari guides and landowners could be effectively collated to determine annual estimates of the lion population size and structure within the conservancy.

Given the difficulties generally encountered when trying to estimate lion abundance in a particular area, it is not surprising to find that lion quotas for hunting concessions in Africa are in most cases based on little more than educated guesses (Severre 1995). Thus, as most hunting areas do not have a reliable count of lions, recommending a number based upon a certain percentage for sustainable harvest is inherently problematic in most areas. Lion hunting is thus generally adaptively managed in the sense that off take is generally a reflection of what hunters were able to find in the previous year. In contrast, with good monitoring it should be possible to set lion hunting quotas in the conservancy more carefully based on good estimates of population size and structure. Adaptive management is an accepted technique in resource management (Holling 1978, Walters 1986), and should be the guiding principle in the conservancy to set annual quotas.

However, in practice sound guidelines and adaptive approaches are often flawed in a few important ways specific to the lion hunting industry. This is because standards in trophy quality are often not maintained, quotas are often set beyond sustainable limits, and lions are often then lured out of national parks into adjacent hunting areas. The problems encountered in the lion hunting industry are primarily because much profit is to be made by shooting lions, and government issued policies and quotas are not always conducive to long-term management, nor are government employees beyond corruption whether it be at the lowest or highest level (Overton, 1998). Thus, unless the professional hunter adheres to a higher standard in selecting trophies and companies follow suit by insisting upon (if not suggesting) sustainable quotas, the profit-based quota system as it stands now is not sustainable in the long-term for most countries.

It is, however, clear that the Savé Valley Conservancy collectively desires to conduct safari hunting in a responsible and conservative manner and will police unethical behaviour. This is

important both in terms of sustainability, and to ensure minimum disruption of the photo-tourism potential within the reserve.

5. Population Dynamics and Regulating Lion Population Growth

Although lion populations in African savannas are generally declining, there are several examples in southern Africa where lions have been reintroduced to private land and due to the protection afforded are increasing in numbers (Funston 2008). Although increases are typically a desired management outcome inevitably most reserves reach a point when management decides that there are now sufficient lions to meet the reserves objectives and thus population control measures need to be instituted (Kettles and Slotow 2009; Slotow & Hunter 2009). Population control of lions does, however, often create a management dilemma as it is not always clear what approach will work best given the specific set of circumstances and budgetary constraints. In order of seeming preference, the measures typically employed to control lion populations include translocation of subadults to new reserves, contraception of breeding lionesses, culling (including trophy hunting) and social manipulation (Kettles & Slotow 2009).

All of these management options require a degree of population monitoring, which is often more costly than the management intervention. Although excess subadult, and even adult, lions could be removed from the Savé Valley Conservancy, it is not clear that there are any immediate destinations that would be suitable for these animals. Thus although a useful approach, translocation is not likely to remove sufficient lions to be considered as the key approach for the conservancy. Contraception can be successfully applied in small reserves where resources, habitat and lion behaviour allow intensive monitoring and manipulation of breeding rates. However, currently in the conservancy the degree of lion monitoring precludes contraception being considered as the main approach to population regulation. Lions are just too shy in the conservancy and not well enough understood to effectively apply contraception. However, this could change with time if more resources are invested in monitoring, and particularly if trophy hunting pressures where eased in areas of the conservancy wanting to focus on photo tourism.

As the numbers of lions in many southern African reserves have reached saturation, generally most reserves are currently faced with the need to cull lions (Kettles & Slotow 2009). Typically this is achieved through the shooting of excess independent subadults, adult male coalitions, and occasionally lionesses from prides. The latter option is problematic mainly in that it induces fear in the lions and thus affects game viewing opportunities. Few reserves are large enough to allow natural population regulation mechanisms to be applied or simulated. However, population control methods that largely simulate natural processes are likely to produce the most desirable outcome, with the

minimum intervention, and thus minimum social disruption. The Savé Valley Conservancy is, however, large enough to allow simulated approaches.

Social disruption *per se* is a fourth population management approach the can be applied but is generally avoided because of how it may affect the tourism value of lions in many reserves. Thus although all feasible approaches to lion population control should be investigated, currently culling as a trophy hunting exercise is the most suitable option for the conservancy. Thus the lion population in the conservancy is large enough that a culling approach whereby lions of the appropriate sex and age are trophy hunted may be sufficient to induce population stability without having to resort to a more generalised culling approach.

To date the aim for trophy hunting lions in the conservancy to date has been economic, with population management recently having become an additional objective. The challenge for conservancy management is to reliably set an off take or quota that meets the economic expectations and effectively limits lion population growth. The basis of this plan draws on research findings that indicate that lion populations are more resilient to trophy hunting when only adult male lions are hunted. However, it is possible that stabilizing lion population growth when they have not reached carrying capacity may not be achieved through sustainable use models based on only hunting mature males. Thus it is likely that female lions will have to comprise a proportion of the quota to effectively limit population growth.

The various estimates suggest that currently there are about 170 lions in the conservancy (Appendix 1). An older male biased trophy hunting system, with limited hunting of adult lionesses in certain contexts should stabilize population growth. To be successfully implemented, however, trophy age needs to be carefully monitored, and accurate hunting records kept. The aging criteria and required hunt records are outlined in Appendix 2. As it is the stated goal of conservancy members to hunt lions for profit, and as the threshold lion population that will not induce financial cost is relatively low (Appendix 3), various trophy hunting options to regulate lion population growth are proposed here. The strategies that are suggested are outlined below and discussed in detail in the following four sections:

5.1 Hunting male lions at an age threshold that will stabilize population growth

Whitman *et al.* (2004) showed that although infanticide increases the risk of population extinction, trophy hunting could be sustained simply by hunting males above a minimum age threshold, and this strategy maximizes both the quantity and the quality of the long-term kill. Whitman *et al.* (2004) conclude that any males $\geq$ 6 years of age can be safely hunted without negative effects on the population. Thus logically if one wanted to reduce a lion population one might hunt males below this age threshold, whereas stability should be

achieved hunting at the age-threshold (see Figure 3). This is proposed as the key lion management tool to be employed in the conservancy.

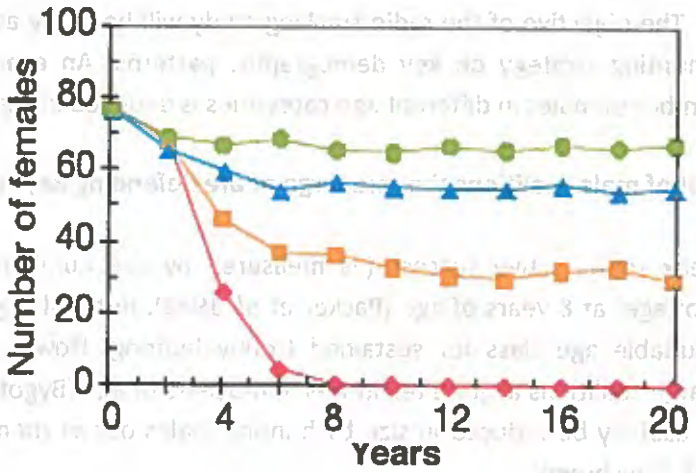

Figure 3. The effects of trophy hunting on the number of adult females after 20 years, as a function of quota size and male age. Average outcome after 100 runs is shown from shooting males of the following ages: ≥3 yr old (red), ≥4 yr (orange), ≥5 yr (blue), ≥6 yr (green)(from Whitman *et al.* 2004).

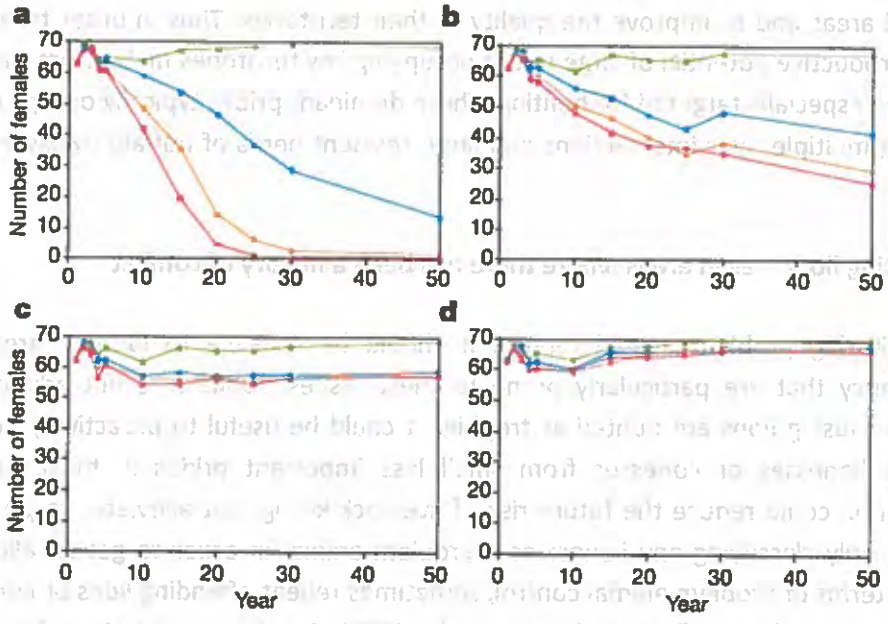

Figure 4. The effect of quota size and male age on female population size through time as a function the age at which males are hunted. Red indicates average outcome over 100 runs from annual quota of 10 males, orange from quota of 6 males, blue from quota of 4, and green from quota of 2. a–d, Female population size when hunters shoot males that are ≥3 yr old (red), ≥4 yr (orange), ≥5 yr (blue), ≥6 yr (green)(from Whitman et al. 2004).

For the seasons 2012-2014 it is proposed that all male lions of five years or older are placed on quota. The outcome of this should be monitored by annual spoor surveys, a second conservancy-wide lion census in 2015, and a radio-tracking based monitoring program for the next three years. The objective of the radio-tracking study will be to try and determine the effects of this hunting strategy on key demographic patterns. An example of how harvesting a fixed number of males in different age categories is depicted in Figure 4.

5.2 Hunting males out of male coalitions that are large or are defending key territories

Male lions reach peak reproductive success (as measured by the number of offspring surviving to 2 years of age) at 8 years of age (Packer *et al.* 1988). But males ≥ 7-8 years of age are the most suitable age class for sustained trophy hunting. However, in certain circumstances very large coalitions acquire territories at 4-5years of age (Bygott *et al.* 1979). These coalitions can usefully be reduced in size by hunting males out of them, which may delay the age at which they breed.

Mosser and Packer (2009) found that territorial competition directly affected critical components of female fitness, and that larger prides gained and maintained access to the highest-quality habitat. Neighbours had a significant negative effect on female reproductive success and survival, and larger prides were significantly more likely to maintain control of disputed areas and to improve the quality of their territories. Thus in order to reduce the high reproductive potential of large prides occupying key territories males from these prides should be especially targeted for hunting. These dominant prides typically occupy territories including multiple river intersections and large resident herds of buffalo (Mosser & Packer 2009).

5.3 Hunting lionesses in areas where there has been a history of conflict

By monitoring problem animal reports it should be possible to identify areas of the conservancy that are particularly prone to these issues. While it is not advocated that problem causing lions are hunted as trophies it could be useful to proactively hunt either subadult lionesses or lionesses from small less important prides in these areas. This intervention could reduce the future risk of livestock killing, but alleviates to possibility of unnecessarily classifying any lioness as a problem animal in order to get an allocation to hunt. In terms of problem animal control, sometimes repeat offending lions or lionesses are best shot to resolve conflict problems (Stander 1998). For the reasons given, however, it is not suggested that these problem animals are trophy hunted. They should preferably be destroyed by conservancy members in collaboration with conservancy management. See section on problem animal control for more details.

5.4 Hunting older females from key prides to stabilize population growth

Although it has been reported generally that hunting lionesses can lead to population declines (Whitman *et al.* 2004, Van Vuuren *et al.* 2004), there are natural scenarios that induce adult female mortality that could be simulated to control lion population growth in the conservancy. Lionesses in large dominant prides sometime kill lionesses from neighbouring prides in territorial fights (Mosser & Packer 2009). But in a population below carrying capacity one might expect fewer territorial fights. Thus one might simulate the 'predatory effect' of neighbours and if females are to be hunted select females from less important prides keeping the nucleus of the dominant prides intact, especially if that meets emerging photo-tourism objectives.

6. Offtake Strategies and Final Recommendations

It is recommended that the off take strategy for lions in the Savé Valley Conservancy should be supported by the following activities:

1. Lion populations should be monitored via track frequency, manager's estimates and for the next three years via radio-tracking and direct counts compiled during an annual workshop to help set the following year's quota.
2. Long-term records of quotas, number of licenses issued, and off take should be maintained and reported on an annual report.
3. Measurements of lion skull size as well as body size should be recorded according to the guidelines specified in Appendix 2 of this plan for all lion shot, and where possible the individual should be identified by reserve management to assure all involved that an appropriate lion was shot.
4. Trophy age should be assessed by a combination of tooth development and wear, nose pigmentation, mane development, etc (see Appendix 2).
5. Hunters should record locations as accurately as possible of all lion shot using a GPS with records going to a central database to monitor intensity of use of certain areas.
6. The professional hunters should adhere to high ethical standards in terms of what is fair chase and in trophy selection.
7. Safaris should not be marketed to clients as "sure things," to relieve professional guides somewhat from pressure at having to deliver a lion, regardless of quality.

7. Response to stock raiding lions (and other predators)

In the Savé Valley Conservancy area there are four main constituencies involved in issues to do with problems of livestock depredation by lions (and large predators). These include:

1. Land owners/managers of private ranches in the conservancy
2. Settled communities within the conservancy
3. Neighbouring communities outside the conservancy, and
4. Zimbabwe National Parks and Wildlife Authority

When incidences of live-stock depredation occur these constituencies have different roles to play in addressing the problem. Ideally these roles, and the procedures to be followed, should be decided as part of a consultative workshop process, which is recommended as a next step. The recommendations presented here are synthesised from other published sources (Funston 2001). The keys to minimising conflict include primarily mitigating or preventing livestock depredation from occurring in the first place, and good communication and effective resolution of problems when they do arise.

7.1 Mitigating (preventing) livestock depredation

Much has been written in the literature about conflict between man, predators and livestock and this remains a highly contentious issue. Clearly findings to date indicate that the best way to minimise the development of conflict situations is through the appropriate livestock husbandry or management practices. Essentially the parties should attempt to minimise the contact between predators and livestock, and have measures in place to warn of the presence of predators in the vicinity of livestock. Once the predators have been detected they can often be chased off without incidence. Accompanying this management plan is a Human-Lion Conflict Toolkit document with all the practical steps that should be implemented to minimise conflict (see page 3 of the toolkit). This toolkit should be made available to all landowners, and representatives of all villages of both settled and neighbouring communities.

Where possible it would be in the long-term interests of landowners within the conservancy to engage, particularly with settled communities, to help them implement the recommendations of the Human-Lion Conflict Toolkit. In summary conflict can largely be mitigated by the following fairly simple husbandry techniques:

a. All grazing livestock should be accompanied by a herder and at least two dogs and donkeys that are wary of lions (and other predators)
b. All livestock should be kraaled at night in lion proof bomas (at least 6 foot high and non-see-through) with at least two herders (owners) and two dogs in attendance.

If these fairly simple measures are in place relatively few conflict situations will arise. The appropriate materials for boma construction vary from site to site, but in the conservancy there should be no shortage of mopane trees for stout pole boma constructions, augmented by old fencing materials (see page 7, 10 and 21 of the toolkit). One of the key weak points in bomas is the gates. Corrugated iron, or flattened oil/diesel drums, can be fashioned into useful and effective gates. Dogs are key to the success of most mitigation measures (see page 16 and 17 of the toolkit), but must be vaccinated to avoid disease transmission. Conservancy members should lobby the authorities in the area for comprehensive vaccination of all dogs.

It is also important to reach out to the communities to assist in educating about predators and how to live with them, and for creating awareness and better attitudes generally (see pages 26 to 31 of the toolkit). Existing outreach programs by various conservancy constituencies should be supported by conservancy members and by a conservancy conservation fund.

7.2 Response to livestock depredation events

7.2.1 Settled and Neighbouring communities

a. Promptly report livestock depredation events to the landowner with title deed for that area, the conservator, and ideally the Zimbabwe National Parks and Wildlife Authority. Report accurately the characteristics of the offending large predators or incident so that all have a better idea of what to expect when planning how to respond. This should include descriptions of a) location b) time of day c) was the livestock animal in a kraal at the time d) what are the specifications of that kraal e) has this happened before recently in this area.
b. Settled communities should invest in the necessary communication technology to effectively and timeously report any incidents.

7.2.2 Landowners with title deeds and conservator

a. Respond promptly to reports of offending large predators and livestock predation incidences.
b. Visit the site where the incident occurred and assess the severity of the situation. Just having someone come and investigate can largely reduce tensions.
c. Consult with livestock owners about their livestock management and if possible offer assistance or advice on how to improve their animal husbandry to minimise conflict. The Human-Lion Conflict Toolkit (see Appendix 2) should be consulted to facilitate solving the problem and advising the most appropriate mitigation measures.
d. In the event of repeat problems in that area, and failing of implementing mitigation measures the best option may be to remove or destroy the offending predators. The actions need to be very focused with the specific offending animals targeted. From 2011

to 2015 there will be a lion conservation and management project running in the conservancy and in Gonarezhou National Park. The park has relatively few lions at present.

e. These suggestions are preliminary and need further deliberation through a workshop before being implemented.
f. Different response guidelines for 'occasional' and 'habitual stock raiders' should be followed.

7.2.3 Stock raider classification

a. Occasional stock raiders (first or one incidence reported)

- Attempt the recommended mitigation measures to determine whether this resolves the problem

b. Habitual stock raiders/problem animals (two or more incidences reported)

- Decide whether to translocate or destroy. For example if a lion eats 10 cows over the course of three weeks because those cows are left wandering around the conservancy at night without any protection, that lion is simply an opportunist, not a problem. If however, a lion takes only 3 cows (3 different incidences) out of a well constructed boma, where there are people and dogs sleeping nearby, it is possibly a genuine problem animal. Once there is evidence that livestock was being properly looked after at the time the incident occurred, mitigation measures may be taken.

7.2.4 Record keeping of incidents and co-operation

a. Community, conservancy and park management staff need to improve their record keeping systems to yield more information about offending animals, e.g. sex, age, status, etc., and communicate this in an annual report to all constituencies.
b. Hold an annual farmers meeting to discuss problems and report back on recent incidents.

8 Acknowledgements

Firstly and very importantly I would like to thank the landowners and managers of the Savé Valley Conservancy for the enriching opportunity to work towards and adaptive management plan for lions the conservancy. There are few areas in Africa where lions are increasing in numbers even when being hunted, with this work thus giving me a unique opportunity.

For all her enthusiasm, tireless efforts and brilliant organisational skills I must specifically thank Dr Rosemary Groom, African Wildlife Conservation Fund, for introducing me to the management challenges facing lions in the conservancy and for the opportunity to address the landowners and managers on this, and survey the lion population in July 2011. For all her efforts in this project, and generally, Rosemary deserves special mention.

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I have had numerous useful discussions with stakeholders in the conservancy with the inputs of in particular the conservator Ox Hacking, as well as Clive Stockil, Dusty Joubert, Roger Whittall, Graham Connear, Norman Monks, Alistair Pole, Duke Cloete, Weldon Schenk, Peter Lindsey and Rosemary Groom all of whom contributed enormously to this work. For their efforts in conducting the 2011 lion survey I am indebted to Rosemary Groom, Dusty Joubert, Chris Hooton, Lisa Lerm, and Ruben. For this I would also like to thank all the conservancy members for access to their properties and information, Chishakwe Ranch for hosting the field team and Hammond, Humani, as Senuko for additional accommodation. I am grateful to the Panthera Foundation for being able to insert the lion and leopard trophy monitoring guidelines. Through the support of biologists, NGO's and funding agencies I hope that the Savé Valley Conservancy can become a model for lion management.

9 References

Anderson, J.L. 1981. The re-establishment and management of a lion population in Zululand, South Africa. *Biological Conservation* **19**:107- 117.

Baskin, Y. 1994. There's a new wildlife policy in Kenya: Use it or lose it. *Science* **265**: 733-734.

Child, G. & Child, B. 1990. An historical perspective of sustainable wildlife utilization. Paper prepared for Workshop No. 7, 18th IUCN General Assembly, Perth.

Creel, S. & Creel .M. 1997. Lion density and population structure in the Selous Game Reserve: evaluation of hunting quotas and offtake. *Afr. J. Ecol.* **35:** 83-93.

Funston, P.J., Mills, M.G.L., Biggs, H.C. and Richardson, P.R.K. 1998. Hunting by male lions: Ecological influences and socio-ecological implications. *Anim. Behav.* **56**: 1333-1345.

Funston, P.J. 1999. Predator-prey relationships between lions and large ungulates in the Kruger National Park. PhD thesis, University of Pretoria.

Funston, P.J., Mills, M.G.L. & Biggs, H.C. 2001. Factors affecting the hunting success of male and female lions in the Kruger National Park. *J. Zool., Lond.* **253:** 419-431.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Kruiper, H., Jaggers, H. & Masule, K. 2001. Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. *In prep.*

Funston, P.J. 2001. Kalahari Transfrontier Lions Project: Final Report.

Funston, P.J., Mills, M.G.L., Richardson, P.R.K. & van Jaarsveld, A.S. 2003. Reduced dispersal and opportunistic territory acquisition in male lions (Panthera leo). *J. Zool., Lond.* **259:** 1-12.

Funston, P.J. & Janse van Rensburg, D. 2003. Venetia-Limpopo Lion Project: Lion Survey March 2003. Submitted to De Beers Ecological Division.

Funston, P.J. 2004. Potential and problems of game ranching with large carnivores in South Africa, 2004. In: *Proceedings of a Symposium on Game Ranch Planning*. Wildlife Group of the South African Veterinary Association, Onderstepoort, South Africa. pp 49-63.

Grant, C.C., Davidson, T, Funston, P.J. & Pienaar, D.J. 2002. Challenges faced in the conservation of rare antelope: a case study on the northern basalt plains of the Kruger National Park. *Koedoe* **45:** 45-66.

Greene, C.M, Umbanhowar, J.A., Mangel, M., & Caro, T. 1998. Animal breeding systems, hunter selectivity, and consumptive use in wildlife conservation. In : *Behavioral Ecology and Conservation Biology* (Ed.) T.M. Caro, Oxford University Press, Oxford, pp. 272-305.

Groom, R.J. 2008. Carnivore densities in the Savé Valley Conservancy; Results of the 2008 spoor survey. *Report for Savé Valley Conservancy Technical Advisory Committee.*

Groom, R.J. 2009. Carnivore densities in the Savé Valley Conservancy; Results of the 2009 spoor survey. *Report for Savé Valley Conservancy Technical Advisory Committee.*

Groom, R.J. 2010. Carnivore densities in the Savé Valley Conservancy; Results of the 2009 spoor survey. *Report for Savé Valley Conservancy Technical Advisory Committee.*

Hoare, R.E., & Williamson, J. 2001. Assisted re-establishment of a resident pride of lions from a largely itinerant population. *S. Afr. J. Wildl. Res.* **31:** 179-182.

Hunter, L. 1999. The socio-ecology of re-introduced lions in small reserves: comparisons with established populations and the implications of management in enclosed conservation areas. *Unpublished report.*

Kelly, M. & Durant, S. 2000. Viability if the Serengeti cheetah population. *Conservation Biology* **14**: 786-797.

Kiss, A. 1990. Living with wildlife: wildlife resource management with local participation in Africa. Technical Paper No. 130. World Bank, Washington, CD.

Kock, R.A. 1995. Wildlife utilization: Use it or lose it - A Kenyan perspective. *Biodiversity and Conservation* **4:** 241-256.

Lavigne, D.M., Callaghan, C.J., & Smith, R.J. 1996. Sustainable utilization: the lessons of history. In: *The Exploitation of Mammal Populations*. (Eds.) V.J. Taylor & N. Dunstone, Chapman & Hall, London, pp. 250-265.

Lindsey, P.A., Alexander, R., du Toit, J.T., & Mills, M.G.L. 2005. The cost efficiency of wild dog conservation in South Africa. *Conservation Biology*, **19**: 1205-1214.

Lindsey, P.A., Alexander, R.R., du Toit, J.T., & Mills, M.G.L. 2005b. The potential contribution of ecotourism to African wild dog Lycaon pictus conservation in South Africa. *Biological Conservation*, **123:** 339-348.

Lindsey, P.A., du Toit, J.T., & Mills, M.G.L. 2004. The distribution and population status of African wild dogs (*Lycaon pictus*) outside protected areas in South Africa. *South African Journal of Wildlife Research*, **34:** 143-151.

Lindsey, P.A., du Toit, R.T., Pole, A., & Romanach, S. 2008. Save Valley Conservancy: a large scale African experiment in co-operative wildlife management. In *Evolution and innovation in wildlife conservation in southern Africa* (eds B. Child, H. Suich & A. Spenceley), pp. 163-184. Earthscan, London.

Lindsey, P.A., Alexander, R., Frank, L.G., Mathieson, A & Romanach, S.S. 2008. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based landuses may not be viable.

Lindsey, P.A., Romanach, S., Tambling, C., Chartier, K., & Groom, R.J. 2011. Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. *Oryx* **45:** 96-111.

Loveridge, A.J., Searle, A.W., Murindagomo, F., & Macdonald, D.W. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. *Biological Conservation* **134:** 548-558

Martin R. & Thomas S. 1991. Quotas for sustainable wildlife utilisation in communal lands. Manual for District Councils with appropriate authority. The Zimbabwe Trust in association with the Department of National Parks and Wildlife Management, Harare, Zimbabwe.

Mills, M.G.L. 1985. Hyaena survey of the Kruger National Park, August 1984. IUCN-SSC Hyaena Specialist Group Newsletter **2**: 15-25.

Mills, M.G. L. 1991. Conservation management of large carnivores in Africa. *Koedoe* **34**(1): 81-90.

Mills, M.G.L. & Shenk, T.M. 1992. Predator-prey relationships: the impact of lion predation on wildebeest and zebra populations. *J. Anim. Ecol.* **61**: 693-702.

Mills, M.G.L. & Gorman, M.I. 1997. Factors affecting the density and distribution of wild dogs in the Kruger National Park. *Conservation Biology* **11**: 1397-1406.

Mills, M.G.L., Juritz, J.M. & Zucchini, W. 2001. Estimating the size of spotted hyaena (Crocuta crocuta) populations, through playback recordings allowing for non-response. *Animal Conservation* **4:** 335- 343.

Mills, M.G.L. & Funston, P.J. 2003. Large carnivores and savanna heterogeneity. In: *The Kruger Experience: Ecology and Management of Savanna Heterogeneity.* (eds.) du Toit, J.T., Biggs, H. and Rogers, R. Island Press, Washington, DC, USA. Pp 370-388.

Norton-Griffiths, M. 1978. *Counting Animals*, 2nd edn. Serengeti Ecological Monitoring Programme. African Wildlife Foundation, Nairobi.

Ogutu, J.O. & Dublin, H.T. 1998. The response of lions and spotted hyenas to sound playbacks as a technique for estimating population size. *Afr. J. Ecol.* **36:** 83-95.

Packer, C., Altizer, S., Appel, M., Brown, E., Martenson, J., O'Brien, S.J., Roelke-Parker, M., Hofmann-Lehmann, R., & Lutz, H. 1999. Viruses of the Serengeti: patterns of infection and mortality in African lions. *J. Anim. Ecol.* **68**: 1161-1178.

Schaller, G.B. 1972. *The Serengeti Lion: A study of predator-prey relations*. University of Chicago Press, Chicago.

Severrre, E.L.M. 1995. Setting quotas for tourist hunting in Tanzania. In: *Tourist Hunting in Tanzania*. (Eds.) Leader-Williams, N., Kayera, J.A., and Overton G.L. Tanzania Department of Wildlife, Dar es Salaam, pp. 52-53.

Smuts, G.L. 1976. Population characteristics and recent history of lions in two parts of the Kruger National Park. *Koedoe* **19**: 153-164.

Smuts, G.L., Whyte, I.J. & Dearlove, T.W. 1977. A mass capture technique for lions. *East African Wildlife Journal* **15**: 81-87.

Smuts, G.L. 1978. Interrelations between predators, prey, and their environment. *BioScience* **28**: 316-320.

Smuts, G.L. et al. 1978. Reproductive and social organisation of lions from the Kruger National Park. *Carnivore* **1**: 17-28.

Stalmans, M., Attwell, B. & Estes, L. 2003. Hunting in the Associated Private Nature Reserves: Environmental Impact Assessment Process, Final Scoping Report, February 2003.

Starfield, A.M., Shiell, J.D. & Smuts, G.L. 1981. Simulation of lion control strategies in a large game reserve. Ecological Modelling **13**: 17 – 28.

Van Dyk, G. 1997. Reintroduction techniques for lion. Proceedings of a *Symposium on Lions and Leopards as Game Ranch Animals*. Wildlife Group, South African Veterinary Association, Onderstepoort. Pages: 82-91.

Van Vuuren, J.H., Herrmann, E. & Funston, P.J. 2004. Lions in the Kgalagadi Transfrontier Park: Modelling the Effect of Human-caused Mortality. *International Transactions in Operational Research*. **123**: 23-40.

Venter J. & Hopkins M.E. 1988. Use of a simulation model in the management of a lion population. *S. Afr. J. Wildl. Res.* **18**: 126-130.

Wilkie, D.S., & Carpenter, J.F. 1999a. Can nature tourism help finance protected areas in the Congo Basin? *Oryx* **33**: 332-338.

Wilkie, D.S., & Carpenter, J.F. 1999b. The potential role of safari hunting as a source of revenue for protected areas in the Congo Basin. *Oryx* **33**: 339-345.

Winterbach, C.H., Winterbach, H., Rutina, L., & Kat, P.W. 1999. Results of the coordinated dry season lion survey for the Okavango Delta 1998. Unpublished report. Department of Wildlife and National Parks, Botswana.

Whitman, K. & Packer, C. 1997. The effect of sport hunting on the social organisation of the African lion (*Panthera leo*). *Proceedings of a Symposium on Lions and Leopards as Game Ranch Animals*, Onderstepoort, 177-183.

Woodroffe, R.A., & Ginsberg, J.R. 1998. Edge effects and the extinction of populations inside protected areas. *Science* **280**: 2126-2128.

Yamazaki, K. 1996. Social variation of lions in a male depopulated area in Zambia. *J. Wildl. Manag.* **60**: 490-497.

Appendix 1: Savé Valley Conservancy Lion Population Survey 2011

Introduction

To augment lion monitoring efforts conducted thus far in the conservancy a baited call-up lion survey was conducted from June 20 to July 10, 2011. This short report is thus largely intended for immediate decision making of lion quotas for 2012-2014. The lion survey was largely designed to determine whether the population increases estimated from spoor counts (Groom 2008-2010; Figure 1), and reported by landowners, were supported by an alternative survey technique. Such a survey would also provide information on the population's age and sex structure which spoor counts cannot do. The average growth rate of the SVC lion population from 1999 to 2010, as estimated largely by spoor counts, was calculated at 35% per year. Such high growth rates have been recorded in re-introduced lion populations elsewhere (Funston 2008), but we wanted to verify if such a high population and growth rate was indeed characteristic of the SVC lion population.

Methods

The survey method used was baited call-up stations as described by Smuts, Whyte & Dearlove (1977), with a modification to the method in the use of camera traps to photograph shy or elusive lions. We used a density of 13 call-up stations per 1,000 km^2, to ensure that we sampled an area of 1886 km^2 assuming a response radius of 5 km (Smuts et al. 1977). A total of 25 stations were surveyed (Figure 5). We attempted to space all stations about 10 km apart from each other, but various logistic constraints precluded an ideal distribution of calling sites in some areas. Notably we would like to survey one or two additional sites on Sango. We were also not granted permission to survey the Msaize and Mapari ranches, and thus positioned calling stations close to their boundaries. For Savuli we had comprehensive camera trap records that further surveying was not necessary in that area. As the stations where placed on the conservancy in a series of concentric 5km radii we assumed this design would achieve as close as possible to a total count, realizing though that the response probability of the lions was not known.

Unlike the non-baited call-up station technique of Ferreira & Funston (2010), the baited call-up design of Smuts et al. (1977) was not calibrated to determine response radius and response probability. However, surveys using this technique in Kruger National Park have consistently revealed close to comprehensive total counts. As we conducted the call-ups for five to six hours, instead of the recommended all night (Smuts et al. 1977), we analyzed our data both with a total count tally, as well as with the relationship defined by Ferreira & Funston (2010) for calling stations to get an idea of how both compared with annual spoor counts (Groom 2008-2010), and with land-owner estimates. A few weeks before the survey

the land owners/managers were asked to collate as much information as possible on the status of lions on their farms. This information was collected in the form of maps where the size, composition, and approximate area of activity of each known lion group were noted. Camera traps placed for hunting purposes greatly facilitated this process.

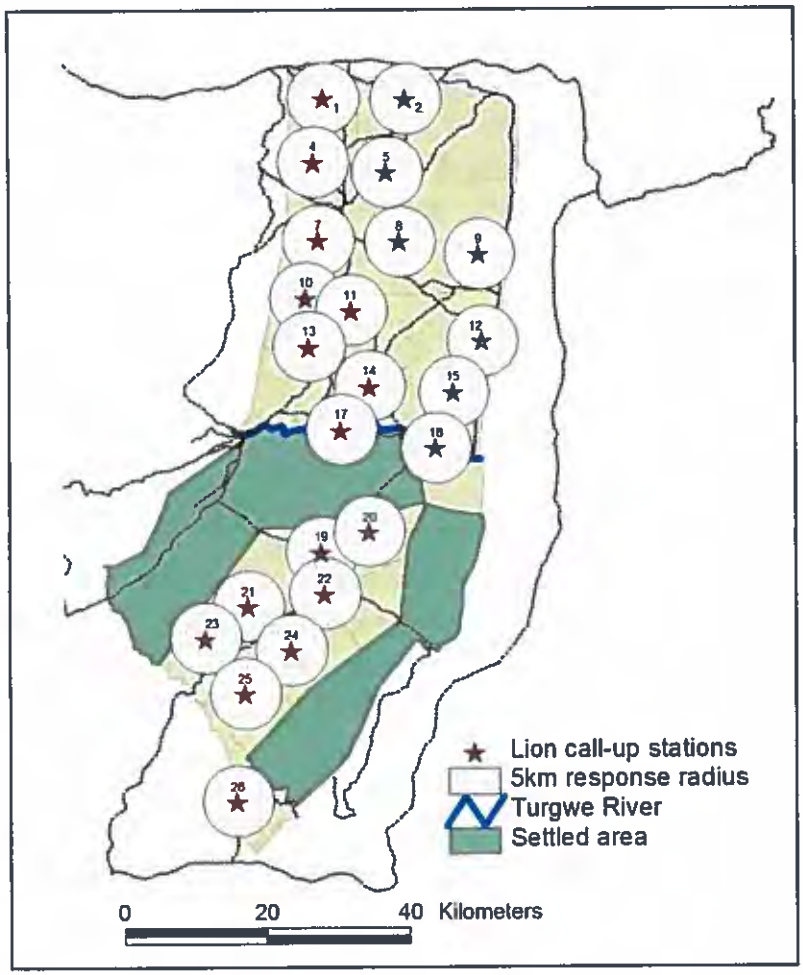

Figure 1. Map of the Savé Valley Conservancy indicating settled area and the planned position of calling stations for the 2011 lion survey

For the survey we used bait in the form of either whole or halved wildebeest and zebra carcasses, and in some cases legs of elephant from culled animals. The gut contents of carcasses were kept and dragged along roads for about 1-3 km in the vicinity of capture stations. Once the drags were completed the carcasses were tied to the base of a stout tree, and branches packed behind the bait to ensure that the lions would feed on the right side of the carcass for identification photographs to be taken, and to permit darting. Camera traps were placed at about 45°relative to the vehicle bait axis on either side 6-10 m from the carcass. At most stations two cameras were used. Just after sunset the sounds of a buffalo calf in distress, and hyaenas and lions feeding, were broadcast in thirty to sixty minute

intervals with sporadic quiet periods interspersed in between. We used an iPod connected to a 12 volt, 60 watt amplifier, connected to two 4-ohm horn speakers, each with a 40 watt driver unit. The speakers were connected in series and placed c. 2.5m above the ground either on the roof of the vehicle, a steel tripod, or suitable tree, facing 180° direction from each other. The vocalisations were broadcast at full volume, with speakers rotated 180° every 30 minutes to get an all-round sound distribution.

At least two observers sat in the back of the vehicle. When any animal was heard approaching, a torch and/or a red-filtered spotlight were used to identify the animal or group of animals. Parameters recorded included species, number of individuals, group composition (age and sex) and time of arrival at the station. Once all lions in the group had arrived, and were accounted for we darted an adult lioness from each pride encountered, and a sample of males above three years of age, for the fitting of Sirtrack VHF radio-collars.

Results and Discussion

A total of 25 stations were sampled over 14 nights. A total of 44 lions were recorded at the stations (Table 1). During the survey ten lions were immobilized of which eight were large enough to be fitted with radio-collars. These included four male and four female lions (Table 2). An additional five radio-collars are still available to be deployed.

Table 1. The sex and age composition and numbers of lions recorded at calling station during the SVC 2011 lion survey

Station	Time	Number	Group composition
5	20:38	2	2 adult females
7	18:20	4	2 adult males (c. 4-5 years) and 2 adult females (c. 7-8 years)
10	20:05	5	1 adult female, 2 large cubs (c 18 months old), 2 young cubs
11	18:00	2	2 subadult males
13	22:00	1	1 adult female (possibly lactating)
14	23:20	2	1 adult male, 1 adult female
18	18:42	2	2 subadult males (3-4 years)
19	17:55	3	3 large male cubs (c. 18 months)
19	21:50	2	2 subadult males(3-4 years)
19	23:00	4	4 subadult females (2-3 years)
20	18:20	4	2 subadult males, 2 subadult females
21	23:42	1	1 subadult male
22	23:20	5	2 subadult males, 3 females
23	20:30	2	2 adult females
23	22:40	2	2 subadult males
26	18:05	3	2 adult females, 1 adult male
	Total	**44**	

Table 2. Details of lions collared during the SVC 2011 lion survey

Station	Ranch	Collared animal	Collar Frequency
7	Sango/Chishakwe Boundary (Vuma hills)	Adult female (c. 7-8 years)	149.3990
		Adult male (c. 4-5 years)	149.0700
11	Sango - Central	Subadult male (c. 3-4 years)	149.2210
19	Humani - near Mbizi dip	Subadult male (c. 3-4 years)	149.0600
20	Humani - Zambara area	Subadult female (c. 3-4 years)	149.3200
23	Hammond - Near Mopane Pan	Adult female (c. 4-5 years)	149.4200
		Subadult male (c. 3-4 years)	149.2390
26	Impala - central	Adult female (c. 3-4 years)	149.4400

The current lion population estimate for SVC (Table 3) is synthesised from several approaches including an estimate based on the 2010 spoor estimate compounded by the average growth rate from 2007 to 2010 (Groom 2008-2010) to give a 2011 estimate, an estimate of the lion population based on extrapolation of the call up survey, the application of the calling station equation (Ferreira & Funston 2010), and the sum of the managers estimates. A synthesised view from all of these is that there are probably about 160-170 lions in the non-settled areas of the SVC at present. The available data does not allow any better estimate but it is encouraging that the spoor, calling station and managers estimates are all very much in line with each other.

Table 3. Estimates of the lion abundance in the SVC as determined by the 2011 lion survey

Survey method used	SVC lion population estimate
Spoor estimate from 2010	148
Call-up estimate	168 (95% confidence limits: 128-207)
Managers estimate	162

The sex and age composition of the 44 lions recorded during the survey are presented in Table 4. During the survey adults comprised 41% (n = 18) of the lions observed, subadults 43 % (n = 19), and cubs 16% (n = 7). These are similar ratios of adults to other studies, but the subadult segment of the population comprised a higher percentage than is typically found. Thus fewer cubs were recorded than is typical. Either lionesses were not willing to bring their young cubs to calling stations or at present the SVC lion population is dominated by young adults and a high proportion of subadults. The latter explanation seems most likely as the lion population only really started increasing dramatically in 2007. Thus it would be expected that as this 'young' lion population matures a subsequent pulse of reproduction is

expected. This is largely supported by the manager's estimates which recorded a slightly higher cub percentage, but nevertheless lower than typical lion populations.

Table 4. The sex and age ratios of lions in the Savé Valley Conservancy from to 2011 lion survey and managers estimates

Sex / Age classes		Total count		Managers estimate	
Adults	Adult females (>4 years)	14		62	
	Mature adult males (>6 years)	0	***41%***	2	***50%***
	Young adult males (4-6 years)	4		17	
Subadults	Subadult females (2-4 years)	6		3	
	Subadult males (2-4 years)	13	***43%***	19	***28%***
	Subadults unknown	0		8	
Cubs	Cubs	7	***16%***	36	***22%***
	Total	**44**		**162**	

Both estimates (total count and managers estimates) sex and age proportions indicate that the SVC lion population has a relatively high number (and proportion) of adult females, very few mature (>6 year) and young adult (4-6 years) males, and a high proportion of subadult (3-4 years) males, with relatively few cubs. Adult lionesses also outnumber adult males by a ratio of 1:3.3 to 1:3.5. This is a relatively high ratio typical of hunted populations where adult males are removed by hunting.

Recommendations

It is clear that a high number (and proportion) of the SVC lion population are sub-adult males suggesting that many of them will mature into the adult age class in the next few years. However, the relatively distorted adult sex ratio indicates that trophy hunting is removing almost all the mature (>6 years) males in the population. During the survey the oldest male lion we observed was only 4-5 years of age and none were suitable trophies. From the managers estimates we only got reports of two mature adult males, with 17 young adult (4-6 years) males being reported. This is further evidence of the fact that trophy hunting in SVC is effectively removing the mature adult male age class from the population.

The lack of mature males does not seem to be problematic in terms of reproduction, as there are relatively high numbers of cubs, and particularly subadults, in the population. The lack of mature males may, however, be problematic for SVC in terms of hunter satisfaction as clients are unlikely to be consistently satisfied with only hunting young males that do not have heavy manes.

As the landowners generally seem to feel that there are either enough, or in many cases too many lions, the method to halt population growth will of necessity have to include the shooting of either adult or subadult lionesses. This is unfortunately unavoidable when the objective is to halt population growth and a population is not at carrying capacity. This is generally accepted practice when the stated objectives of a wildlife production system dictate that a large carnivore population is too abundant (Packer et al. 2009). Managed hunting of lions will also need to consider illegal killing of problem animals especially by poisoning, but also by shooting.

Thus when setting annual quotas SVC managers need to balance economic returns from good quality trophies, remove the appropriate number of lionesses, and factor in illegal killing, to result in population stability and halt population growth. It may thus be wise to market three types of lion hunts in SVC, which could include a limited number of high quality older male trophies, a larger segment of young relatively poorer quality trophies, and a similar number of lioness trophies. The lionesses should ideally be as young as is acceptable for a trophy, and of an animal not associating in recognised prides. Young lionesses breed at higher rates than older lionesses, with mature pride-living lionesses perhaps being better utilised for photo-tourism opportunities. An additional advantage of shooting young lions is that this age class are the ones most likely to kill livestock.

Ultimately the decision on what and how to hunt lions in SVC lies with the landowners, and needs to be integrated into the overall conservation and management objectives of the conservancy.

Appendix 2: Assessment of trophy hunted lion and leopard trophies

Guidelines for data collection

Sport hunting can provide considerable benefits to conservation if managed sustainably. However, this requires careful regulation and a high degree of compliance with "best practice" standards. This is particularly important for large carnivore species such as lion and leopard that are sensitive to human disturbance and have recently suffered widespread declines. There is a need to standardize data collected from lion and leopard trophies across their range to allow independent assessment of trophy age, trophy quality, and hunt effort. Such data can enable wildlife agencies to track population trends of hunted species over time and react to changes accordingly. The sex and age of harvested individuals will also influence the biological impacts of hunting, and must therefore be monitored closely. In addition, blood and skin samples can easily be taken from trophies to provide valuable information on disease and genetics in wild lion and leopard populations. These data would add immeasurably to conservation efforts.

Effective monitoring requires collaboration between professional hunters (PHs), operators, conservation authorities, and researchers. In this document we provide guidelines on the information and measurements that should routinely be taken from every trophy animal and each hunt. Some of the information is collected in the field by the professional hunter immediately after the hunt, while other data are collected at a later date by examining the cleaned skull. It requires no technical ability or special equipment other than a GPS, digital camera, and measuring tape; all of which are commonly used by sport hunters.

Section A: Information to be provided by professional hunters/operators

1. Hunt return forms

Measures of hunting effort can be used as an index to gauge population trends. This information is best collected on a printed hunt return form filled in by the PH after *every* lion and leopard hunt (i.e. for successful and unsuccessful hunts). Questions should not exceed one page (an example of a hunt return form is provided in Appendix I). The submission of hunt return forms must be mandatory; these data are only useful if collected in a rigorous and consistent manner. Operators must be penalised for failure to submit forms. The onus is on the operator to ensure that all information is sent to the relevant authority by the end of the hunting season. Self addressed envelopes can be provided if postage is necessary.

2. Measurements (included on the hunt return form)

Accurate measurements of body and skull size can assist authorities to age lion and leopard trophies. The Division of Scientific Authority from the U.S. Fish and Wildlife Service require measurements of body size to permit importation of leopard trophies into the United States. In addition, PHs and operators routinely measure skull width and height to provide a Safari Club International rating (width + height in inches) to clients. However, the SCI rating on its own is of limited use; the individual metrics in millimeters are needed to estimate age.

The following body measurements should be taken for every lion and leopard trophy before the animal is skinned:

a) Body length (cm, tip of nose to tip of tail; Measurement A–C)
b) Shoulder height (cm, tip of scapula to end of forepaw; Measurement E)
c) Neck circumference - *only for leopard* (cm, immediately behind the ear; Measurement D)

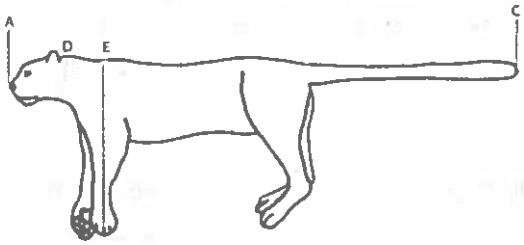

Figure 1: Body measurements to be taken for each trophy before skinning.

Skull measurements should preferably be done by wildlife officials with the skull in hand. However, if this is not possible, operators must provide accurate measurements from the cleaned skull. The following data should be collected:

a) Skull length (mm, greatest length of skull, measured as a straight line between pegs)
b) Skull width (mm, greatest width measured across zygomatic arches)
c) Distance between the post-orbital processes

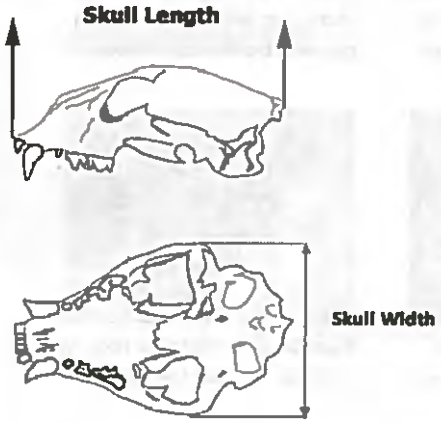

Figure 2: Skull measurements to be taken for each lion and leopard trophy.

3. Photographs

Photographs of the trophy can be used to age hunted lion and leopard effectively. While the traditional photographs taken by clients are useful, more detailed photographs showing body size, facial characteristics, nose pigmentation, tooth wear, and skull dimensions are required for reliable aging. They must be taken from the correct angle and at the highest possible resolution (minimum of 1MB per photo). Nose, teeth, and skull photographs are best taken with the macro-function setting (which is a feature on most cameras) to prevent blurring. The time and date must be correctly set for digital images. Images must also be labeled/tagged with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, and the name of the hunting block or property where the hunt was undertaken. Digital images can either be sent by email or placed on a CD and posted with the hunt return form.

Six photographs are required for each lion and leopard trophy before it is skinned (Plates 1a-f and 2a-f) and a further six photographs from the cleaned skull (Plate 3a-f). The skull photographs and measurements should preferably be done by wildlife officials with the skull in hand. However, if this is not possible, operators must submit all twelve photographs.

Plate 1. Lion (before the trophy is skinned):

Plate 1a: Side view showing the entire body with the hunter directly behind for scale. Useful for assessing body size and condition, and basic mane development.

Plate 1b: Side view of the head and shoulder showing mane development above and behind the ears, and between the shoulder blades.

Plate 1c: Frontal view of the head and chest. Useful for assessing mane development on the chest and between the ears.

Plate 1d: Frontal view of the face showing facial scarring and the nose from directly in front.

Plate 1e: Close up of the nose clearly showing the extent of pigmentation.

Plate 1f: Frontal view of the teeth showing coloration and wear on the canines and incisors.

Plate 2. Leopard (before the trophy is skinned).

Plate 2a: Side view showing the entire body with the hunter directly behind for scale. Useful for assessing body size and condition.

Plate 2b: Side view of the head (lifted) and shoulders. Useful for assessing neck circumference and dewlap development.

Plate 2c: Frontal view of the face showing the position and condition of the ears, and facial scarring.

Plate 2d: Close up of the nose clearly showing the extent of pigmentation.

Plate 2e: Frontal view of the teeth showing coloration and wear on the canines and incisors.

Plate 2f: Posterior view of the hindquarters clearly showing the presence or absence of a scrotum.

Plate 3. Clean skull (same for lion and leopard)

Plate 3a: Lower jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.

Plate 3b: Upper jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.

Plate 3c: Side view of the lower jaw (either side) showing the canine and wear on the cusps of molars and premolars

Plate 3d: Wide shot of all the teeth showing wear, broken teeth, and teeth coloration

Plate 3e: Top view of the skull displaying the distance between the postorbital processes. A measure of scale must be included.

Plate 3f: Side view of the skull showing the relative height of the saggital crest. A measure of scale must be included.

4. Removal of single rooted premolar (P^2) for x-ray assessment

Post mortem x-rays of teeth can assist with aging trophies - the pulp cavity fills in as lion and leopard get older. The best tooth to remove is the first upper premolar (P^2 below); it does not matter from which side of the skull. P^2 is small and will not affect the overall appearance of the trophy. The tooth can be removed from the skull using a pair of pliers although care must be taken not to crack it. The tooth can be placed in an envelope and sent with the hunt return form and photographs. It is essential the envelope is correctly labeled with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, the date the trophy was taken, and the name of the hunting block or property where the hunt was undertaken.

Section B: Additional information that should be collected from trophy animals

Trophy hunted lions and leopards provide a valuable opportunity to collect samples for ongoing conservation research projects. These samples may be particularly important from

areas where research is not currently taking place. They can be collected voluntarily by interested PHs and provided to researchers for analysis. The onus is on the researcher to provide collection materials, details of how the samples must be collected, and to collect the samples at the end of the season. Accurate labeling of each sample is essential with a GPS location (in decimal degrees), the name of the collector, the species, and the date as a minimum.

1. Skin, hair, and scat samples for genetic analysis:

Genetic samples collected from lion and leopard trophies can be used to assess sub-speciation, estimate population size and dispersal distance, examine connectivity between populations, and investigate inbreeding dynamics. This information is critical for establishing range-wide conservation strategies for large carnivores.

DNA can be collected from the trophy by cutting a very small (3-4 mm) disc of skin (that includes both tissue and hair) from anywhere on the carcass. This can be stored in a small cryotube containing either 95% ethanol or salt. If a sterile container is not available, several hairs can be plucked from the trophy (ensuring that the hair root is attached) and placed in a paper envelope.

Genetic material can also be sourced from lion and leopard scat collected by hunters (scat is often found near baits). The best way to handle the samples is to air dry them thoroughly and then to store them individually in sealed plastic bags.

2. Blood samples for disease analysis:

Certain feline diseases such FIV and canine distemper can be tested from blood samples taken by placing a Whatman blotting (filter) paper on the bullet wound until it has soaked through. The paper is then air-dried for 5-10 minutes and stored in an envelope in a cool place. No special techniques or materials are needed other than the Whatman paper, which will be provided by the researcher.

3. Trail camera photographs:

Many hunters now place trail cameras at baits to assess trophy quality prior to setting a blind. Photographs taken by trail cameras can be used by researchers to identify individuals in an area, estimate the relative abundance and vulnerability of different age cohorts in a population, and assess hunter selectivity. PHs must ensure that the date and time information is set correctly on cameras. They should also record the number of cameras that are deployed each day, the number of days that each camera is deployed, and the location (GPS position in decimal degrees) where cameras are deployed.

HUNT PERMIT NUMBER | CLIENT NAME

PROFESSIONAL HUNTER | HUNTING OUTFITTER

HUNTING BLOCK | CONCESSION HOLDER

HUNT START DATE | HUNT FINISH DATE

1. Was the hunt successful? YES NO
If no, why not? _____

2. Number of lion / leopard seen during hunt (please provide photographs if possible):

Free ranging: | On baits:

3. Number of baits used (specify number and species e.g. 5 impala, 1 zebra): _____

4. Number of bait sites: | 5. Number of sites fed on by lion / leopard:

6. Sex and age of lion / leopard on baits (male, female, subadult, cubs) and how determined (tracks, camera-trapped, seen):

IF TROPHY WAS TAKEN:

7. Date trophy taken: | 8. Time shot:

9. Location GPS (in decimal degrees):

10. Condition of animal (e.g. thin, fat, parasites, scars, wounds, sick, radio-collared, snare wounds, etc.): _____

MEASUREMENTS:

11. Skull length (mm): | 12. Skull width (mm):

13. Body length (cm): | 14. Shoulder height (cm):

15. Neck circumference (mm):

PHOTOGRAPHS (before skinning):

- Side view of entire body ☐
- Side view of head and shoulders ☐
- Front view of head and chest (*for lion*) ☐
- Front view of face ☐
- Close up of nose ☐
- Hindquarters showing scrotum (*for leopard*) ☐

PHOTOGRAPHS (clean skull)

- Posterior view of lower jaw ☐
- Posterior view of upper jaw ☐
- Side view of lower jaw ☐
- Wide shot of all teeth ☐

SAMPLES

- 2 x premolar for x-ray analysis ☐
- DNA (4-mm tissue plug including hair) ☐
- Saturated blood collection paper ☐

Return form to:
Name:
Organisation:
Address:

Fax Number:
Email :

Appendix 3: Balancing financial and conservation imperatives: trade-offs to maintain viable large carnivore populations and profitable trophy hunting

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Summary

1. Large African carnivores are financially valuable for ecotourism and trophy hunting operations on private, communal and multiple-use state land utilised for wildlife production. However, above certain densities, such species may impose economic costs through impacts on populations of ungulates that are also valuable for trophy hunting. High densities of large carnivores may adversely affect conservation efforts involving smaller carnivore species such as vulnerable cheetahs (*Acinonyx jubatus*) and endangered African wild dogs (*Lycaon pictus*).
2. We investigated the economic and conservation trade-offs associated with managing various species of large carnivores on large, often privately or co-managed communal land (>1000km^2), using a collaboratively managed private wildlife area in south-eastern Zimbabwe, Savé Valley Conservancy (3440km^2) as a case study.
3. Lions (*Panthera leo*) impose substantial economic costs through predation on ungulates, specifically, but for leopards (*Panthera pardus*), trophy hunting benefits significantly outweigh their predation costs. Poaching further disturbed ecological processes.
4. We argue that introducing lions to wildlife production systems necessitates that income from lions is increased by either raising the price of lion hunts, or that income derived from photo-tourism is needed to offset the economic impact of lions.
5. Other members of the large carnivore guild do not influence financial and ecological dynamics nearly as strongly as do lions, and species such as endangered cheetahs and wild dogs may benefit from managed lower densities of lions in hunting concessions and private ranches.
6. Although lions fulfil many important ecological processes, that we have not quantified, there is a need to balance ecological and economic imperatives on private and co-managed communal land to ensure that wildlife-based land uses continue to compare favourably in financial terms with alternative and less conservation-friendly land uses, such as livestock production.

Key words, lions, leopards, predation, trophy hunting, financial implications, management, balancing costs

Introduction

Wild large herbivores provide goods and income to rural communities, have major impacts on land use and habitats of conservation importance and, in some cases, face local or global extinction. As a result, substantial effort is applied to their management across the globe (Gordon, Hester & Festa-Bianchet 2004). In areas where herbivores are commercially utilized, large carnivores can create both economic costs and benefits (Peel & Montagu 1999; Power 2002; Caro *et al.* 2009). In Africa, lions (*Panthera leo*) and leopards (*Panthera pardus*) are unambiguously valuable for ecotourism operations, are high value trophy hunting species, and attract high-paying international tourists (Grobbelaar & Masulani 2003; Booth 2004; Loveridge *et al.* 2007). However, all carnivores impose a cost by consuming herbivores. Thus while sport hunting has provides important economic incentives for conserving wild herbivores, the benefits of wildlife-ranching with large carnivores are less clear (Lindsey *et al.* 2005b).

At natural densities African large carnivores regulate herbivore populations (Fryxell, Greever & Sinclair 1988; Mills & Shenk 1992; Grange *et al.* 2004; Grange & Duncan 2006). Lions especially are the key drivers of this process, being one of the strongest ecological drivers in African savannas (Funston & Mills 2006; Grange & Duncan 2006). Thus, there is a limit to the number of herbivores that can be sustainably removed when lion populations approach equilibrium (Peel & Montagu 1999). These effects are also strongly cyclical, influenced by rainfall variability (Mills, Biggs & Whyte 1995; Funston & Mills 2006; Owen-Smith & Mills 2008a). Predator numbers must be accounted for when calculating harvests of herbivores. Many wildlife populations are additionally impacted by poaching (Lindsey *et al.* 2011).

While most large African carnivores tend to kill smaller, less valuable prey species (Pole *et al.* 2004; Radloff & du Toit 2004; Hayward *et al.* 2006a; Hayward *et al.* 2006b), lions select mainly medium- to large-sized ungulates (Funston *et al.* 1998; Radloff & du Toit 2004; Hayward & Kerley 2005, 2008) that are valuable. If lions and other carnivores reduce the sustainable yield of herbivores, they come into direct competition with hunting operators and local communities that benefit from these resources. This is a world-wide phenomenon where large carnivores occur (Langholz *et al.* 2000). In most countries in Africa, the surface area that is designated either communal or national hunting concessions/game reserves is substantially larger than areas covered by national parks where no hunting is generally allowed (Wilkie & Carpenter 1999; Archabald & Naughton-Treves 2001).

Many of these areas offer the possibility of conserving lions, leopard and spotted hyena (*Crocuta crocuta*), but these species often result in conflict leading to persecution (Ogada *et al.* 2003; Woodroffe & Frank 2005; Kissui 2008; Maclennan *et al.* 2009) or are overhunted (Loveridge *et al.* 2007; Packer *et al.* 2009). However these areas offer ideal habitat for rarer large carnivore species such as cheetahs (*Acinonyx jubatus*) (Durant 2000; Gros 2002; Marker *et al.* 2003) and wild dogs (*Lycaon pictus*) (Woodroffe & Ginsberg 1999; Creel & Creel 2002; Lindsey, du Toit & Mills 2004; Woodroffe *et al.* 2007). Dominant large carnivores, however, can also impact cheetah and wild dog

populations negatively through direct and indirect mechanisms (Caro 1994; Laurenson 1994; Laurenson, Wielebnowski & Caro 1995; Creel & Creel 1996; Durant 2000; Creel, Mills & McNutt 2004). As a model for other areas we examined the Savé Valley Conservancy (SVC), a 3,440 km^2 privately owned ranch in Zimbabwe, where hunting provides the main source of income (Lindsey *et al.* 2011). We used spreadsheet models to evaluate the financial implications of large carnivores in private wildlife areas, and discuss the need for management of lion populations for both economic and ecological sustainability.

Methods and methods

2.1. Study area

Savé Valley Conservancy (3,440km^2), located in a semi-arid area of southeast Zimbabwe, was formed in 1991 by amalgamating 20 cattle ranches, into which 14 species of wildlife reintroduced, and land use shifted to high quality ecotourism and trophy hunting (Lindsey *et al.* 2008). These land use objectives were pursued successfully until a third of the conservancy was annexed in 2001 during Zimbabwe's land 'reform' program (Lindsey *et al.* 2008). Photo-tourism is now almost non-existent and there are high levels of poaching (Lindsey *et al.* 2011).

Large carnivores were all but extirpated by the cattle ranchers (du Toit 1994; Pole 1999). However, in SVC all have increased through natural recolonization, or augmentation, with lion and spotted hyenas populations showing the longest lag effect. Wild dogs, however, increased rapidly following recolonization of the area in 1992 (Pole 1999), due to their high fecundity, the absence of lions, and abundant prey. They peaked at 3.9 wild dogs/100 km^2 in 2004, the highest density on record (Pole 2006; Lindsey *et al.* 2008). Cheetah populations also increased rapidly, but for unexplained reasons declined 2005. Leopard densities seem to have remained relatively high throughout (C.J. Joubert, *pers. comm.*).

2.2. Population estimates

Annual total-count aerial surveys of larger herbivores from 2004 to 2010 (Joubert & Joubert 2010), with adjustment for undercounting (Bothma *et al.* 1990), estimated populations of ten key large carnivore prey species. For large carnivores wild dogs were estimated annually from 1996 through individual monitoring. Lion and spotted hyena populations were estimated sporadically from 1996 to 2007 using call-up surveys (Pole 1999; Pole 2003). From 2007 estimates for large carnivores other than wild dogs were by annual track density index surveys (Funston *et al.* 2010). The generalised model of Funston *et al.* (2010) was used for all species other than leopards where Stander's (1998) model was more appropriate. Cheetah and leopard populations were assumed to be relatively stable from 2005 to 2008. Population estimates for years without surveys were estimated from graph trend lines. Population carrying capacities of large carnivores were determined based on herbivore abundance models (Hayward, O'Brien & Kerley 2007).

2.4. Model development

To assess the impact of all forms of mortality on economics and ungulate trends we built a spreadsheet model with various key inputs.

2.4.1. Prey preferences of large carnivores

To determine the relative proportion of various ungulate species in the diet of large carnivores, where possible we used data from SVC. Scat analyses (Mbizah 2009) provided the basis for determining the prey preferences, but low numbers of lion and cheetah scats necessitated using data from nearby Kruger National Park (Kruger) (Radloff & du Toit 2004). Importantly, eland (*Taurotragus oryx*) and sable antelope (*Hippotragus niger*) did not occur in the area sampled by Radloff & du Toit (2004), and were thus factored into our prey preferences relative to abundance, and accounted for all 'other' species killed by lions, being relatively preferred by lions (Hayward & Kerley 2005).

2.4.2. Predation rates

To estimate annual predation rates we used daily minimum food requirements (Table 1) to calculate the number of adult female equivalents, based on body mass (Skinner & Smithers 1990), of each herbivore that would need to have been killed to meet their needs, in proportion to the prey preference ratios. The available biomass per kill was an estimate of the relative proportion of meat available from small- (<100 kg = 75%), medium- (100-300 kg = 66%) and large-sized (>300 kg = 60%) ungulates. Adults were assumed to make up 50% of each large carnivore population, and sub-adults and cubs were assumed to consume 50% of the adult female requirement (Table 1). However, due to differences in the diets of male and female lions (Funston *et al.* 1998; Radloff & du Toit 2004), we calculated predation rates for each sex.

Table 1. Minimum daily food requirements of the various large carnivore species

	Adults (kg)	Sub-adults and cubs (kg)	Literature source
Female lions	**5**	**2.50**	**(Schaller 1972)**
Male lions	**7.5**		**(Schaller 1972)**
Leopards	**2.5**	**1.25**	**(Bailey 1993)**
Cheetahs	**2.8**	**1.20**	**(Frame 1999)**
Wild dogs	**2.8**	**1.40**	**(Pole 1999)**
Spotted hyenas	**4.0**	**2.00**	**(Henschel & Tilson 1988)**

The total numbers of ten important herbivores killed per large carnivore species per year was estimated by combining the relative proportions of herbivores in the diet, the biomass requirements of each large carnivore, and the numbers each prey species that an individual would kill, multiplied by the annual population estimate of each large carnivore species. We halved this for spotted hyenas as in nearby Kruger spotted hyenas hunted only 50% of their diet, scavenging the rest (Henschel & Skinner 1990).

2.4.3. Determining ungulate population trends

We estimated mortality by summing all quantifiable causes of ungulate mortality. These included trophy hunting, live-capture, poaching and predation estimates. The number of animals found poached from 2005-2009 was adjusted following Lindsey *et al.* (2011). To validate this section of the model we calculated growth rates for time $_t$ to time $_{t+1year}$ that would have been required to reach the population estimates of the following year.

2.4.3. Economic calculations

The financial gains from trophy hunting were calculated as the trophy fee value and the meat value of each animal hunted. However, for buffalo (*Syncerus caffer*) and sable, which were used to sell hunting packages commanding a daily rate in addition to trophy fees, hunt-package fees were also included in the model (calculated as minimum hunt duration x daily rate). The financial losses attributable to predation, poaching and live sales were calculated by summing the value lost in terms of meat, foregone trophy fees, and for buffalo and sable for foregone hunt-package fees. Removals of zebra (*Equus burchelli*) was assumed to result in the additional loss of the value of skins (US$200/individual) (Lindsey *et al.* 2011). All trophy values, daily rates and minimum hunt durations were taken from the main hunting outfitter in the area (Zambezi Hunters 2010).

The value of meat was estimated from the mean adult female body mass of each species (Skinner & Smithers 1990), the mean percentage of body mass comprised of flesh (Bothma, van Rooyen & du Toit 2010), and the mean price that meat was sold for (USD 1.50kg^{-1}). As animals lost to either predation or poaching would not necessarily have been trophy animals, only the average percentage of the overall population of each species hunted from 2005-2009, were considered to be trophies, for which the relevant fee or combined hunt package fee was used to determine that proportion of the losses incurred to large carnivores. To estimate the net economic cost or benefit of various large carnivore species we calculated the annual value of herbivores killed by each carnivore species from the model. We then compared this with the total financial value accrued from hunting those species.

Results

3.1. Population estimates

Buffalo were the only herbivore species that increased in numbers from 2004-2010 (Fig. 2). Populations of giraffe (*Giraffa camelopardalis*), sable antelope, and wildebeest (*Connochaetes taurinus*) remained relatively stable, while eland, kudu (*Tragelaphus strepsiceros*), waterbuck (*Kobus ellipsiprymnus*), zebra, impala (*Aepyceros melampus*) and warthog (*Phacochoerus aethiopicus*) declined. Most large carnivores increased over a ten year period (Fig. 3), with the numbers of lions,

spotted hyenas and cheetahs in SVC being significantly lower than would be expected based on available prey (X^2 = 203, df = 4, P < 0.01) (Table 2).

Table 2. Actual population estimates and predicted population sizes for SVC based on average adjusted herbivore numbers from 2005 to 2009, based on the model of Hayward *et al.* (2007)

	Estimated population in 2009	Potential carrying capacity
Lions	148	271
Leopards	249	136
Cheetahs	5	55
Wild dogs	60	63
Spotted hyenas	123	427

3.2. Large carnivore utilization

From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year^{-1}), yielding gross income of US$912,900 (US$182,580 year^{-1}). During the same time 144 leopards were hunted (mean = 28.8 leopards year^{-1}), generating a gross income of US$2,135,232 (US$427,046 year^{-1}). A few cheetahs (n = 5) and spotted hyenas (n = 6) were also hunted, with wild dogs being legally protected.

3.3. Model results

The estimated relative proportion of herbivore prey in the diet of large carnivores was used to estimate the number of prey species killed by each individual large carnivore per year (Table 3). Data showed that lions predated mostly on large herbivores, with male lions preying more heavily on buffalo (Table 3). Herbivore growth rates, determined from aerial surveys, showed that the average required population growth rates generated by the model were similar to those recorded elsewhere (Table 4).

3.3.4. Economic calculations

The model showed that lions, poaching and spotted hyena predation had the greatest proportional financial impact, whereas the costs of leopards, wild dogs and cheetahs were proportionally very much less (Fig. 4). It also showed that at all lion abundances the net cost to predation by lions exceeds the gross income from hunting them, irrespective of the formula used (Fig. 5). It should be noted though that gross income from trophy hunting the selected herbivores, lions and leopards, exceeded the financial losses to poaching and predation by an average of 74%, (Table 5).

Even relatively low earnings per landowner from photo-tourism that could be attributed to the presence of lions (e.g. US$5,000 per year^{-1}), combined with a 5% male lion harvest, resulted in a positive gross financial benefit for up to 70 individuals. These benefits increase as the tourism income ascribed to the presence of lions increases, with 135 lions resulting in no gross costs if each landowner was earning

Table 3. Percentage of herbivores in the diet of the large carnivores used in the development of the model, with the estimated number of each key ungulate species caught per individual predator per year

Prey size / species	Percentage of each prey species (number of prey species caught year^{-1})					
	Male lions	Female lions	Leopards	Cheetahs	Wild dogs	Spotted hyenas
Large (>350 kg)						
Buffalo	45.0 (4.50)	1.2 (1.20)	4.8 (0.00)	0.1 (0.02)	-	2.6 (0.05)
Eland	4.0 (1.00)	4.5 (0.22)	0.0 (0.05)	-	-	1.3 (0.03)
Giraffe	19.3 (1.10)	4.3 (0.12)	-	-	-	-
Medium (100 – 350 kg)						
Kudu	1.4 (0.40)	9.3 (1.23)	7.5 (0.50)	3.7 (0.23)	12.5 (1.16)	19.2 (1.01)
Sable	1.1 (0.20)	2.0 (0.23)	0.1 (0.35)	-	0.1 (0.11)	6.4 (0.20)
Waterbuck	1.4 (0.30)	3.1 (0.36)	1.5 (0.26)	1.2 (0.07)	4.2 (0.34)	2.6 (0.12)
Wildebeest	2.1 (0.50)	10.9 (1.17)	6.0 (0.32)	2.7 (0.14)	1.4 (0.11)	6.4 (0.28)
Zebra	6.4 (0.90)	8.4 (0.58)	-	-	-	-
Small (<100 kg)						
Impala	13.6 (12.10)	40.2 (17.94)	60.3 (14.99)	67.7 (14.50)	73.6 (16.46)	46.2 (8.25)
Warthog	5.7 (3.70)	11.3 (3.65)	7.5 (0.24)	4.2 (0.65)	2.8 (0.63)	-
Other	0.0	1.2	17.2	20.6	5.5	15.3

Table 4. Mean growth rates of the key herbivore populations in the Savé Valley Conservancy from 2005 to 2009, and the growth rates needed to match the next year's aerial estimates after all mortality had been accounted for. These growth rates were compared with mean growth rates of herbivores in Kruger National Park and a variety of South African game ranches and reserves (from Bothma *et al.* 2010)

	In SVC from 2005-2010	Required to achieve the years estimate	Kruger National Park (high predator densities)	Game ranches (low predator densities)
Buffalo	8.9	14.7	16*	12-18
Eland	-6.2	0.2		11-38
Giraffe	-0.2	6.9	5.2	12
Kudu	-17.1	23.4	14.8	13-28
Sable	-2.1	11.0		12-28
Waterbuck	-14.0	9.6	13.4	15-35
Wildebeest	-2.2	5.2	17.4	28-38
Zebra	-11.1	0.8	12.4	21-29
Impala	-8.7	26.8	11.6	23-48
Warthog	-18.4	10.2	12.3	

Table 5. The relative gross financial benefits (in US dollars) of trophy hunting ten key herbivores species, leopards and lions, relative to the costs incurred by poaching and predation

	2005	2006	2007	2008	2009

Hunting income:					
Selected herbivores	1,689,670	2,104,260	2,11,8750	2,470,990	2,423,870
Lions	161,100	161,100	161,100	107,400	322,200
Leopards	400,356	504,152	504,152	370,700	355,872
Total	**2,251,126**	**2,769,512**	**2,784,002**	**2,949,090**	**3,101,942**
Income lost to poaching (%)	132,065 (5.9)	90,506 (3.3)	139,969 (5.0)	171,091 (5.8)	179,279 (5.8)
Income lost to predators (%)	437,670 (19.4)	496,561 (17.9)	457,874 (16.4)	693,357 (23.5)	906,450 (29.2)

US$10,000 year^{-1} from lion related photo tourism (Fig. 5). For leopards, however, there was a gross financial benefit at all abundance levels (Fig. 5).

4. Discussion

4.1 Ungulate populations

Large carnivores influence herbivore populations in profound ways that are often associated with climatic variability. Thus managers need to monitor trends and interpret them in the context of rainfall patterns, predation pressure, and human mortality. In our case study combined pressures of hunting, live sales, poaching, and predation may be negatively influencing the populations of some herbivore species, such as eland, kudu, waterbuck, zebra, impala and warthog. Buffalo, the highest value species, however, showed positive population growth and sable antelope, another high value species, seemed to be stable. There are several explanations for, and implications of, these trends. Firstly, climatically SVC has experienced wetter than average rainfall conditions in the last decade that would be expected by to induce predation driven declines for kudu, waterbuck, zebra, wildebeest and warthog (Mills *et al.* 1995; Funston & Mills 2006; Owen-Smith & Mills 2008b). Zebra are important prey species of lions (Mills & Shenk 1992; Hayward & Kerley 2005) and can be vulnerable to over predation as they have foals throughout the year that are preferred by lions, and show relatively slow development when compared with other ungulates (Grange *et al.* 2004; Grange & Duncan 2006). This cautions against the over utilization of zebra with lions potentially shifting to more valuable herbivore species should the zebra population decline. Eland are highly preferred prey of lions (Hayward & Kerley 2005), and due to their very mobile nature may also be more susceptible to poaching, both of which may be driving population declines. Impala are important prey of all large carnivores (Hayward & Kerley 2008; Owen-Smith & Mills 2008a), which when combined with high hunting, management offtake and poaching may be driving population declines.

4.2. Large carnivore populations

Large carnivore populations were stable or increasing. In terms of their impact on the herbivore-economic dynamic, management mainly needs to decide the best course of action with respect to the dominant influence of lions. Currently lions are at about half of expected ecological equilibrium, at which point lions would have an economic impact that could not be offset by hunting. Moreover

with current herbivore offtakes through hunting, poaching and live sales, such predation levels would be expected to result in herbivore collapse.

In Africa, interactions within the large carnivore guild result in cheetahs (Laurenson 1994; Durant 2000) and wild dogs (Mills & Gorman 1997; Creel & Creel 2002) declining in response to high lion and spotted hyena abundance. Conversely mesopredator release can benefit these species, as well as leopards, when lions and spotted hyenas abundances are low (Crooks & Soulé 1999; Pole 1999; Packer *et al.* 2009). Generally dominant larger carnivores have negative effects on rarer smaller species (Kitchen, Gese & Schauster 1999; Bonesi & Macdonald 2004). These effects have implications for attempts to conserve smaller carnivores both generally and through reintroductions (Lindsey *et al.* 2005a). In SVC, where the wild dog population comprises a significant component (c. 17%) of a small and declining national population, local declines are a concern. Therefore, for lion populations to be temporarily controlled to achieve conservation objectives for endangered species could be considered reasonable practice (Linnell & Strand 2000).

4.3 Economic implications

Several key deductions can be made from the economic model. Firstly, the gross income from trophy hunting of herbivores and carnivores, plus live sales of herbivores, collectively outweighed the losses incurred by predation by a substantial margin. This is likely to be true of any area. However, the net income was not known, and the initial capital investments and running costs of the ranch and hunting safaris, as well as losses to predation and poaching, may well exceed income from hunting. Several landowners reported that with a hunting-only model they were making a net loss, and that if hunting only was applied to remedy this, this would not be sustainable. Seemingly in SVC the only way to make lions more financially viable would be to incorporate photo-tourism, or not have high value species such as sable antelope on the conservancy with lions, or buffalo vulnerable to lions.

We do though make one important caveat in our conclusions. In our case study we were dealing with a recovering lion population substantially below carrying capacity. Lions need to hunt in large groups to successfully hunt buffalo (Scheel & Packer 1991; Funston, Mills & Biggs 2001). We did not have kill data available and it is possible that we overestimated the predation rates on buffalo. Furthermore, lion predation on buffalo varies dramatically with rainfall regimes (Mills *et al.* 1995; Owen-Smith & Mills 2008b) and under current rainfall lions would not be expected to predate heavily on buffalo. However, buffalo remain an important prey species for lions and in terms of the general applicability of the model we believe that without data to the contrary one has to assume that on average buffalo would comprise roughly the proportions in the diet of lions that we used.

Lion predation accounted for the bulk of the loss (47%) to large carnivores, which when the income generated from trophy hunting lions was subtracted, resulted in a net loss of US$115,705 year^{-1} specifically for lions. Leopards, on the other hand resulted in a net benefit of US$ 395,151 year^{-1}. Thus while it is clear that lions impose a substantial cost to a wildlife production system (about 8% loss relative to gross income), the impact of this needs to be evaluated against the objectives of the reserve. The model presented in Fig. 5 indicates a harvesting percentage of five percent of the population. This quota may, however, be too high, and result in social instability in a lion population, with harvest rates of about three percent (Creel & Creel 1997), and the hunting of older males

generally being recommended (Whitman *et al.* 2004; Loveridge *et al.* 2007). Adding a small number of lionesses to the hunting quota did not increase the relative profitability of lions substantially, but may be needed if regulating the population of lions was defined as a management need (Packer *et al.* 2009). In order to protect large carnivore populations from declining, national authorities worldwide generally only allow only the hunting of male large carnivores as trophies (Whitman *et al.* 2004; Packer *et al.* 2009). However, livestock and wildlife producers and local communities may need, under certain circumstances, to shoot adult female large carnivores to either halt or reduce population levels (Packer *et al.* 2009).

Lion trophy fees in Zimbabwe (US$5,983) are substantially lower than the average trophy fees in other African countries (US$14,584) (Booth 2009). However, even if lion hunt prices were increased from the current SVC price of US$53,700 (Zambezi Hunters 2010), or the Zimbabwe average of US$51,918 to the African average of US$70,115 (Booth 2009), at a harvest rate of 3% lions would not be any more profitable. Before applying this model, elsewhere, it should be parameterised by local values of all variables, which might influence findings. Lion hunting is an important income generator in Africa hunting concessions (Booth 2009), especially in arid areas without mega-herbivores and buffalo, and where leopards occur at low densities (Stander 1998; Martin 2008). If lions were listed on CITES Appendix 1 this would impose severe restriction on hunting lions and essentially terminate this avenue of income generation. Such a listing would have major implications for management decisions in private wildlife and communal areas, where other interventions (including poisoning) may be employed to reduce lion densities to protect populations of herbivores (both wild and domestic).

Overutilization of leopards was possibly occurring in SVC. Leopards, like lions, are susceptible to overharvesting of adult males as they are an infanticidal species (Packer *et al.* 2009; Packer *et al.* 2011). In SVC the high current abundance of leopards may be as a result mesopredator release owing to low sympatric lion abundances. However, a higher lion population, combined with sustained high hunting pressure, is likely to result in a decline in leopard abundance. Thus in areas where leopard hunting predominates as an economic activity, it may be advisable to regulate lions at a level where they do not impact additionally on the leopards.

4.4 Management implications

Due to the relatively high costs associated with lion predation, landowners in wildlife production systems or rural communities co-existing with lions should consider generating income from lions in other ways. High quality ecotourism operations in areas of exceptional scenery and wildlife resources have clear economic potential, and should be encouraged wherever possible (Barnes 2001). Lions are one of the cornerstones of the photo-tourism industry worth substantially more alive than dead in most areas (Thresher 1981). However, photo-tourism is susceptible to political instability (Reid 1999), and is often not viable in areas lacking high densities of wildlife, scenic splendour, client safety or adequate infrastructure (Krüger 2005). Zimbabwe has been politically unstable for an extended time period, and there is currently little photo-tourism demand or suitable tourism infrastructure in SVC.

Consequently, to allow wildlife-based land uses to compete with alternative options (e.g. livestock ranching or agriculture) it is important that landholders and communities are able to utilize wildlife to generate sufficient income to offset the costs of wildlife. This may include well managed sustainable trophy hunting, which in many areas is the only viable means of generating income from wildlife (Child 1996). Ultimately the responsibility to decide how many lions should occupy a private area lies with landholders. This model is applicable anywhere in the world where large carnivores live on private or rural land, but because of their size and preferred prey is particularly relevant to areas with African lions.

In private or communally owned wildlife areas, management of larger carnivores may be necessary to maximize other returns (Packer *et al.* 2009). This may in turn create favourable opportunities that ensure the persistence of competitively inferior and endangered large carnivores, and may even be justifiable on these grounds alone in some small state protected areas.

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References

Archabald, K. & Naughton-Treves, L. (2001) Tourism revenue-sharing around national parks in Western Uganda: early efforts to identify and reward local communities. *Environmental Conservation*, **28**, 135-149.

Bailey, T.N. (1993) *The African leopard: ecology and behavior of a solitary felid* Columbia University Press, New York.

Barnes, J.I. (2001) Economic returns and allocation of resources in the wildlife sector of Botswana. *South African Journal of Wildlife Research*, **31**, 141-153.

Bonesi, L. & Macdonald, D.W. (2004) Impact of released Eurasian otters on a population of American mink: a test using an experimental approach. *Oikos*, **106**, 9-18.

Booth, V. (2004) Zambezi Valley hunting camps: summary of auction prices. *African Hunter*, **10**, 31-32.

Booth, V.R. (2009). A Comparison of the Prices of Hunting Tourism in Southern and Eastern Africa. Joint publication of FAO and CIC, Budapest.

Bothma, J.d.P., Peel, M.S.J., Petit, S., & Grossman, D. (1990) Evaluating the accuracy of some commonly used game-counting methods. *South African Journal of Wildlife Research*, **20**, 26-32.

Bothma, J.d.P., van Rooyen, N., & du Toit, J.T. (2010). Antelope and other small herbivores. In *Game Ranch Management - Fifth Edition* (eds J.d.P. Bothma & J.T. du Toit), pp. 210-245. Van Schaik, Pretoria.

Caro, T.M. (1994) *Cheetahs of the Serengeti Plains: group living in an asocial species.* University of Chicago Press, Chicago.

Caro, T.M., Young, C.R., Cauldwell, A.E., & Brown, D.D.E. (2009) Animal breeding systems and big game hunting: Models and application. *Biological Conservation*, **142**, 909-929.

Child, B. (1996) The practice and principles of community-based wildlife management in Zimbabwe: the CAMPFIRE programme. *Biodiversity and Conservation*, **5**, 369-398.

Creel, S. & Creel, N.M. (1996) Limitation of African Wild Dogs by Competition with Larger Carnivores. *Conservation Biology*, **10**, 526-538.

Creel, S. & Creel, N.M. (1997) Lion density and population structure in the Selous Game Reserve: evaluation of hunting quotas and offtake. *African Journal of Ecology*, **35**, 83-93.

Creel, S. & Creel, N.M. (2002) *The African Wild Dog. Behavior, Ecology and Conservation* Princeton University Press, Princeton & Oxford.

Creel, S., Mills, M.G.L., & McNutt, J.W. (2004). African wild dogs: demography and population dynamics of African wild dogs in three critical populations. In *The biology and conservation of wild canids.* (eds D.W. Macdonald & C. Sillero-Zubiri), pp. 337-350. Oxford University Press, Oxford.

Crooks, K.R. & Soulé, M.E. (1999) Mesopredator release and avifaunal extinctions in a fragmented system. *Nature*, **400**.

du Toit, R.F. (1994). The Save Valley Conservancy. In *The Lowveld Conservancies: New opportunities for productive and sustainable land use*, pp. 28-36. Price Waterhouse Wildlife, Tourism and Environmental Consulting, Zimbabwe.

Durant, S.M. (2000) Living with the enemy: avoidance of of hyenas and lions by cheetahs in the Serengeti. *Behavioural Ecology*, **11**, 624-632.

Frame, G. (1999). Cheetah. In *The encyclopedia of mammals* (ed D.W. Macdonald), pp. 58-62. Andromeda Oxford Limited, Oxford.

Fryxell, J.M., Greever, J., & Sinclair, A.R.E. (1988) Why are migratory ungulates so abundant? *The American Naturalist*, **131**, 781-798.

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, **281**, 56-65.

Funston, P.J. & Mills, M.G. (2006) The influence of lion predation on the population dynamics of common large ungulates in the Kruger National Park. *South African Journal of Wildlife Research*, **36**, 9-22.

Funston, P.J., Mills, M.G.L., & Biggs, H.C. (2001) Factors affecting hunting success of male and female lions in the Kruger National Park. *Journal of Zoology*, **253**, 419-431.

Funston, P.J., Mills, M.G.L., Biggs, H.C., & Richardson, P.R.K. (1998) Hunting by male lions: ecological influences and socioecological implications. *Animal Behaviour*, **56**, 1333-1345.

Gordon, I.J., Hester, A.J., & Festa-Bianchet, M. (2004) The management of wild large herbivores to meet economic, conservation and environmental objectives. *Journal of Applied Ecology*, **41**, 1021-1031.

Grange, S. & Duncan, P. (2006) Bottom-up and top-down processes in African ungulate communities: resources and predation acting on the relative abundance of zebra and grazing bovids. *Ecography*, **29**, 899-907.

Grange, S., Duncan, P., Gaillard, J.M., Sinclair, A.R.E., Gogan, P.J.P., Packer, C., Hofer, H., & East, M. (2004) What limits the Serengeti zebra population? *Oecologia*, **140**, 523-532.

Grobbelaar, C. & Masulani, R. (2003). Review of offtake quotas, trophy quality and 'catch-effort' across the four main wildlife species elephant, buffalo, lion and leopard., Harare, Zimbabwe.

Gros, P.M. (2002) The status and conservation of the cheetah *Acinonyx jubatus* in Tanzania. *Biological Conservation*, **106**.

Hayward, M.W., Henschel, P., O'Brien, J., Hofmeyr, M., Balme, G., & Kerley, G.I.H. (2006a) Prey preferences of the leopard (*Panthera pardus*). *Journal of Zoology*, **270**, 298-313.

Hayward, M.W., Hofmeyr, M., O'Brien, J., & Kerley, G.I.H. (2006b) Prey preferences of the cheetah (*Acinonyx jubatus*) (Felidae: Carnivora): morphological limitations or the need to capture rapidly consumable prey before kleptoparasites arrive? *Journal of Zoology*, **270**, 615-627.

Hayward, M.W. & Kerley, G.I.H. (2005) Prey preferences of the lion (*Panthera leo*). *Journal of the Zoological Society of London*, **267**, 309-322.

Hayward, M.W. & Kerley, G.I.H. (2008) Prey preferences and dietary overlap amongst Africa's large predators. *South African Journal of Wildlife Research*, **38**, 93-108.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, **139**, 219-229.

Henschel, J.R. & Skinner, J.D. (1990) The diet of spotted hyaenas *Crocuta crocuta* in Kruger National Park. *African Journal of Ecology*, **28**, 69-82.

Henschel, J.R. & Tilson, R.L. (1988) How much does a spotted hyaena eat? Perspective from the Namib desert. *African Journal of Ecology*, **26**, 247-255.

Joubert, C.J. & Joubert, L. (2010). Aerial suvery of the larger herbivores, Savé Valley Conservancy, Zimbabwe. Report complied for the Technical Advisory Committee of the Savé Valley Conservancy.

Kissui, B.M. (2008) Livestock predation by lions, leopards, spotted hyenas, and their vulnerability to retaliatory killing in the Maasai steppe, Tanzania. *Animal Conservation*, **11**, 422-432.

Kitchen, A.M., Gese, E.M., & Schauster, E.R. (1999) Resource partitioning between coyotes and swift foxes: space, time, and diet. *Canadian Journal of Zoology*, **77**, 1645-1656.

Krüger, O. (2005) The role of ecotourism in conservation: panacea or Pandora's box? *Biodiversity and Conservation*, **14**.

Langholz, J.A., Lassoie, J.P., Lee, D., & Chapman, D. (2000) Economic considerations of privately owned parks. *Ecological Economics*, **33**, 173-183.

Laurenson, M.K. (1994) High juvenile mortality in cheetahs (*Acinonyx jubatus*) and its consequence for maternal care. *Journal of Zoology*, **234**, 387-408.

Laurenson, M.K., Wielebnowski, N., & Caro, T.M. (1995) Extrinsic factors and juvenile mortality in cheetahs. *Conservation Biology*, **9**, 1329-1331.

Lindsey, P.A., Alexander, R., du Toit, J.T., & Mills, M.G.L. (2005a) The cost efficiency of wild dog conservation in South Africa. *Conservation Biology*, **19**, 1205-1214.

Lindsey, P.A., Alexander, R.R., du Toit, J.T., & Mills, M.G.L. (2005b) The potential contribution of ecotourism to African wild dog Lycaon pictus conservation in South Africa. *Biological Conservation*, **123**, 339-348.

Lindsey, P.A., du Toit, J.T., & Mills, M.G.L. (2004) The distribution and population status of African wild dogs (*Lycaon pictus*) outside protected areas in South Africa. *South African Journal of Wildlife Research*, **34**, 143-151.

Lindsey, P.A., du Toit, R.T., Pole, A., & Romanach, S. (2008). Save Valley Conservancy: a large scale African experiment in co-operative wildlife management. In *Evolution and innovation in wildlife conservation in southern Africa* (eds B. Child, H. Suich & A. Spenceley), pp. 163-184. Earthscan, London.

Lindsey, P.A., Romanach, S., Tambling, C., Chartier, K., & Groom, R.J. (2011) Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. *Oryx*, **45**, 96-111.

Linnell, J.D.C. & Strand, O. (2000) Interference interactions, co-existence and conservation of mammalian carnivores. *Diversity and Distributions*, **6**, 169-176.

Loveridge, A.J., Searle, A.W., Murindagomo, F., & Macdonald, D.W. (2007) The impact of sport-hunting on the population dynamics of an African lion population in a protected area. *Biological Conservation*, **134**, 548-558.

Maclennan, S.D., Groom, R.J., Macdonald, D.W., & Frank, L.G. (2009) Evaluation of a compensation scheme to bring about pastoralist tolerance of lions. *Biological Conservation*, **142**, 2419-2427.

Marker, L.L., Dickman, A.J., Mills, M.G.L., & Macdonald, D.W. (2003) Aspects of the management of cheetahs, Acinonyx jubatus jubatus,trapped on Namibian farmlands. *Biological Conservation*, **114**, 401-412.

Martin, R.B. (2008). Review of safari hunting in Botswana: Financial and economic assessment - draft report. Consultancy for The Botswana Wildlife Management Assoication.

Mbizah, M.M. (2009) *Diet choice of African wild dog (Lycaon pictus) and competition with other large carnivores in Savé Valley Conservancy, south east lowveld, Zimbabwe*. Master of Science, University of Zimbabwe, Harare.

Mills, M.G.L., Biggs, H.C., & Whyte, I.J. (1995) The relationship between rainfall, lion predation and population trends in African herbivores. *Wildlife Research*, **22**, 75-88.

Mills, M.G.L. & Gorman, M.L. (1997) Factors affecting the density and distribution of African wild dogs in the Kruger National Park. *Conservation Biology*, **11**, 1397-1406.

Mills, M.G.L. & Shenk, T.M. (1992) Predator-prey relationships: The impact of lion predation on wildebeest and zebra populations. *Journal of Animal Ecology*, **61**, 693-702.

Ogada, M.O., Woodroffe, R., Oguge, N.O., & Frank, L.G. (2003) Limiting depredation by African carnivores: the role of livestock husbandry. *Conservation Biology*, **17**, 1521-1530.

Owen-Smith, N. & Mills, M.G.L. (2008a) Predator-prey size relationships in an African large-mammal food web. *Journal of Animal Ecology*, **77**, 173-183.

Owen-Smith, N. & Mills, M.G.L. (2008b) Shifting prey selection generates contrasting herbivore dynamics within a large-mammal predator-prey web. *Ecology*, **89**, 1120-1133.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., & Caro, T.M. (2011) Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology*, **25**, 142-153.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., & Nowell, K. (2009) Sport hunting, predator control and conservation of large carnivores. *PLOS One*, **4**, e5941.

Peel, M.S.J. & Montagu, G.P. (1999) Modelling predator-prey interactions on a Northern Province game ranch. *South African Journal of Wildlife Research*, **29**, 31-34.

Pole, A. (2003). Hyena Survey of the Savé Valley Conservancy, November 2003. Unpublished report for Savé Valley Conservancy.

Pole, A. (2006). Management Plan for the Save Valley Conservancy. Unpublished report.

Pole, A., Gordon, I.J., Gorman, M.L., & MacAskill, M. (2004) Prey selection by African wild dogs (*Lycaon pictus*) in southern Zimbabwe. *Journal of Zoology*, **262**, 207-215.

Pole, A.J. (1999) *The behaviour and ecology of African wild dogs, Lycaon pictus, in an environment with reduced competitor density.* PhD, University of Aberdeen, Aberdeen.

Power, R.J. (2002) Prey selection of lions *Panthera leo* in a small, enclosed reserve. *Koedoe*, **45**, 67-75.

Radloff, F.G.T. & du Toit, J.T. (2004) Large predators and their prey in a southern African savanna: a predator's size determines its prey size range. *Journal of Animal Ecology*, **73**, 410-423.

Reid, D.G. (1999) *Ecotourism development in eastern and southern Africa* University of Guelph Press, Guelph, Canada.

Schaller, G.B. (1972) *The Serengeti Lion: A study of predator-prey relations* University of Chicago Press, Chicago.

Scheel, D. & Packer, C. (1991) Group hunting behaviour of lions: a search for cooperation. *Animal Behaviour*, **41**, 697-710.

Skinner, J.D. & Smithers, R.H.N. (1990) *The Mammals of the Southern African Subregion.* University of Pretoria, Pretoria.

Stander, P.E. (1998) Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, **35**, 378-385.

Thresher, P. (1981) The economics of a lion. *Unasylva*, **33**, 134.

Whitman, K., Quadling, H., Starfiled, A., & Packer, C. (2004) Sustainable trophy hunting in African lions. *Nature*, **428**, 175-178.

Wilkie, D.S. & Carpenter, J.F. (1999) Can nature tourism help finance protected areas in the Congo basin? *Oryx*, **33**.

Woodroffe, R., Davies-Mostert, H., Ginsberg, J., Graf, J., Leigh, K., McCreery, K., Mills, G., Pole, A., Rasmussen, G., Robbins, R., Somers, M., & Szykman, M. (2007) Rates and causes of mortality in Endangered African wild dogs Lycaon pictus: lessons for management and monitoring. *Oryz*, **41**, 215-223.

Woodroffe, R. & Frank, L. (2005) Lethal control of African lion (Panthera leo): local and regional population impacts. *Animal Conservation*, **8**, 91-98.

Woodroffe, R. & Ginsberg, J.R. (1999) Conserving the African wild dog *Lycaon pictus*. 1. Diagnosing and treating causes of decline. *Oryx*, 33, 132-142.

Zambezi Hunters (2010).

http://www.zambezihunters.com/ZH%20Save%20Valley%20Conservancy.html.

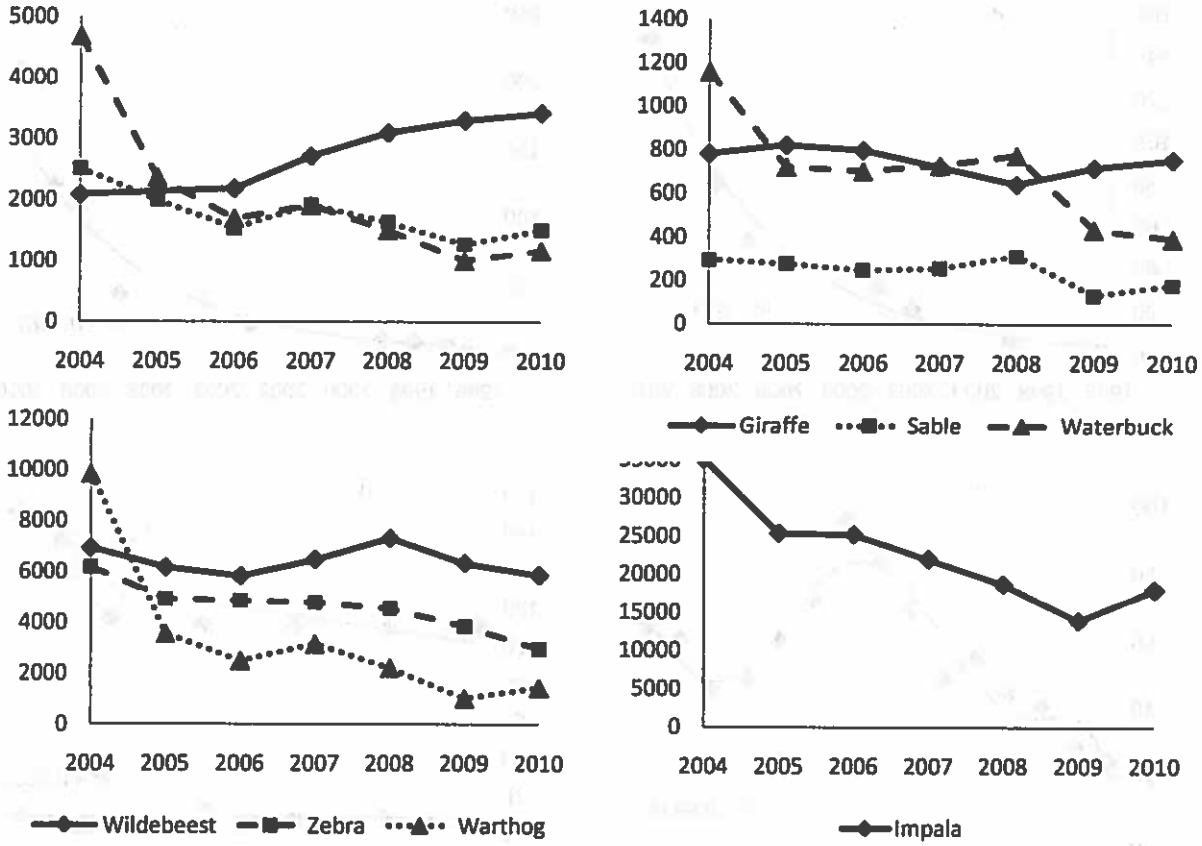

Figure 1. Population trends of ten key herbivore species in Savé Valley Conservancy from 2004 to 2010

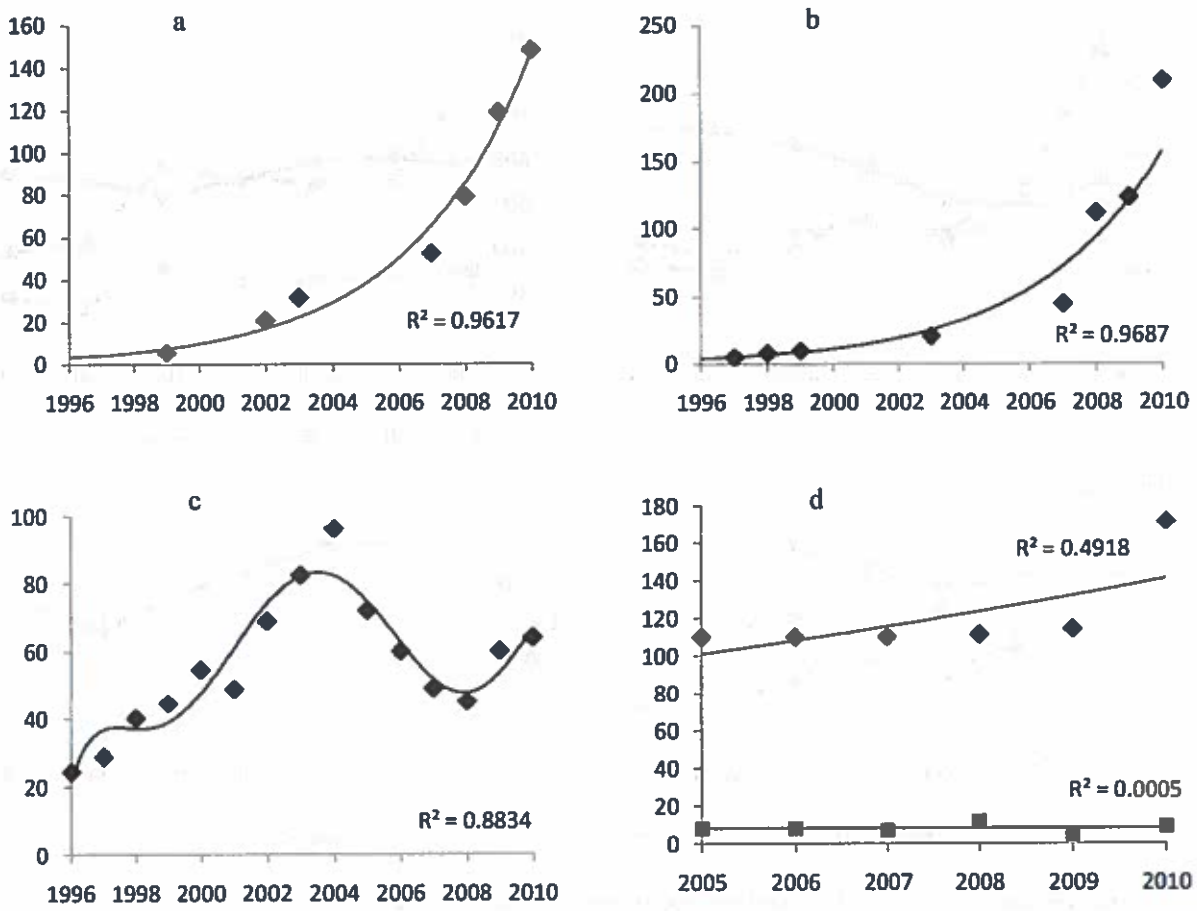

Figure 3. Population trends of a) lions, b) spotted hyenas, c) African wild dogs, and d) leopards (diamonds) and cheetahs (squares) in the Savé Valley Conservancy from 2000 to 2010. Best fit trend lines are fitted: exponential for lions, hyenas and leopard, polynomial order 6 for wild dogs and linear for cheetah

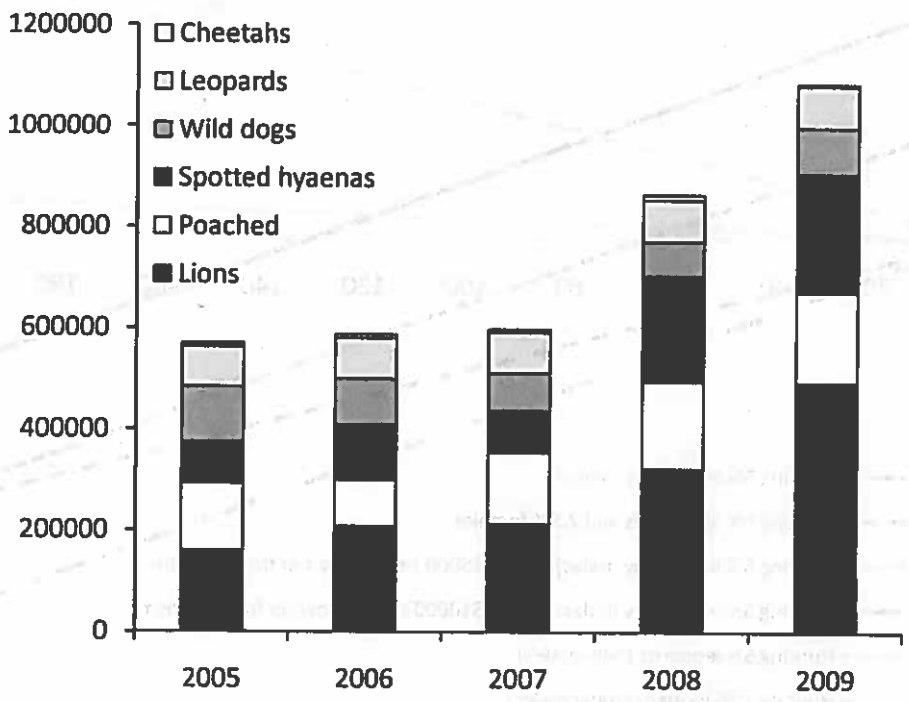

Figure 4. Stacked bar graph depicting the proportional economic losses in US dollars lost in the SVC to the five main predators and poaching from 2005 to 2009

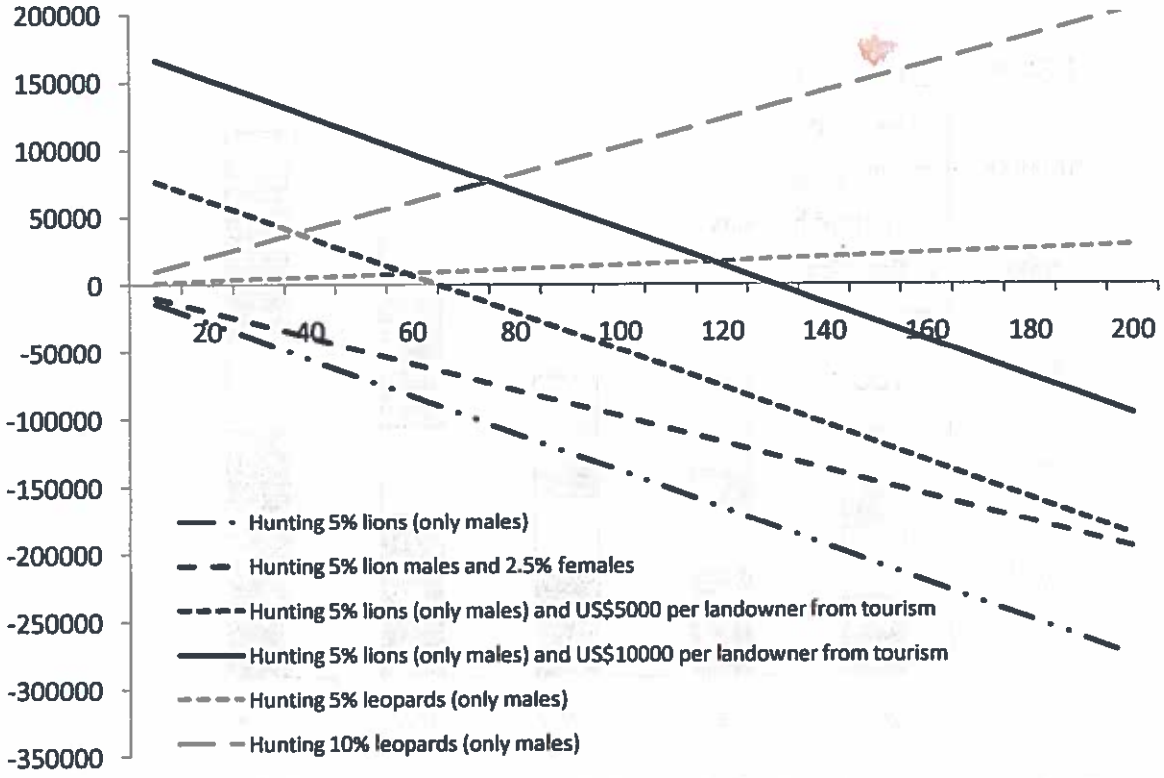

Figure 5. Projected net benefits of trophy hunting and photo-tourism based on 2009 trophy and day hunting fees for landowners in the Savé Valley Conservancy using various hunting offtake percentages. Number of individuals is displayed on the X axis.

From: King, Jenna D
To: (b) (6)
Cc: Brisendine, Amy
Subject: FWS Permit Application #33696D
Date: Friday, August 14, 2020 11:29:35 AM

Hello Mr. Fryer,

This email is in regard to your FWS permit application #33696D to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 7/15/2019 and 8/5/2019. Please provide the specific date that the lion was taken. Also, we need the specific ranch in Save Valley Conservancy within which the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: King, Jenna D
To: (b) (6)
Subject: Re: [EXTERNAL] Re: FWS Permit Application #33696D
Date: Friday, August 14, 2020 12:29:05 PM

Hi Ken,

Thank you for the information and for the pictures of the hunting document. My apologies for any inconvenience, but in the photo of the document, it looks like the lion was taken October 22, 2019 instead of Oct. 24, 2019. The "Date Shot" column is a little blurry though, so I could be misreading. Can you please confirm? Thank you.

Jenna

From: KENNETH FRYER (b) (6)
Sent: Friday, August 14, 2020 12:07 PM
To: King, Jenna D <jenna_king@fws.gov>
Subject: [EXTERNAL] Re: FWS Permit Application #33696D

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Jenna, the lion was taken at Chishakwe. October 24,2019. I sent all this info to you registered mail. If there is more info you need I can resend. I'll photograph and email. Thanks for heads up. Ken

Sent from my iPhone

> On Aug 14, 2020, at 8:29 AM, King, Jenna D <jenna_king@fws.gov> wrote:
>
> Hello Mr. Fryer,
>
> This email is in regard to your FWS permit application #33696D to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 7/15/2019 and 8/5/2019. Please provide the specific date that the lion was taken. Also, we need the specific ranch in Save Valley Conservancy within which the lion was taken.

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Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: (b) (6)
To: King, Jenna D
Subject: [EXTERNAL] Re: FWS Permit Application #33696D
Date: Friday, August 14, 2020 12:08:48 PM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Jenna, the lion was taken at Chishakwe. October 24,2019. I sent all this info to you registered mail. If there is more info you need I can resend. I'll photograph and email. Thanks for heads up. Ken

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>
> Please reply directly to this email with the requested information.
>
> Thank you and let me know if you have any questions.
>
> *In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office* ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*
>
> Thank you,
>
> Jenna King

U.S. Fish and Wildlife Service
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Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: (b) (6)
To: King, Jenna D
Subject: Re: [EXTERNAL] Re: FWS Permit Application #33696D
Date: Friday, August 14, 2020 1:51:42 PM

You are correct. October 22.

Sent from my iPhone

> On Aug 14, 2020, at 9:29 AM, King, Jenna D <jenna_king@fws.gov> wrote:
>
> Hi Ken,
>
> Thank you for the information and for the pictures of the hunting document. My apologies for any inconvenience, but in the photo of the document, it looks like the lion was taken October 22, 2019 instead of Oct. 24, 2019. The "Date Shot" column is a little blurry though, so I could be misreading. Can you please confirm? Thank you.
>
> Jenna

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Sent: Friday, August 14, 2020 12:07 PM
To: King, Jenna D <jenna_king@fws.gov>
Subject: [EXTERNAL] Re: FWS Permit Application #33696D

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3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	1,500.00	Total Quesita rate	.00
Less Commission	.00	Total Trophy fees	9,500.00
Other fees (Incidentals)	8,120.00	Grand Total USD	19,120.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	WIK	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	BUFFALO	M	Killed	Chishakwe	36K014743	24-OCT-2019	80	3,000
2	ELAND	M	Killed	Chishakwe	36K019715	27-OCT-2019	77 "	1,000
3	LION	M	Killed	Chishakwe	36K083760	22-OCT-2019	25	5,500
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

Name of Professional Hunter	ADAM GOOSEN	Lice
Telephone		Fax
Number of Accompanying Guests		0
Are the trophies being exported after tanning and mounting?		No
Are the trophies being exported after primary treatment?		yes
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Add
Name of Shipping Agent		Add
Name of Foreign Agent		Add

2. HUNTING AREAS

	Hunting Area Name	Province
1	Chishakwe	Masvingo
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		

Date of Safari From	18-10-2019
Date of Safari To	28-10-2019
Daily Rate Charged For Big Game USD	150.00
Daily Rate Charged For Plains Game USD	150.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000082437
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	PASSING CLOUD SAFARIS T/A PRO SAFARIS AFRICA	Client's Full Name	Kenneth Barger Fryer
ZTA (HOP) No.	HOP0012	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	20 HADDON AVENUE KHUMALO BULAWAYO	Address	(b) (6)
Name of Professional Hunter	ADAM GOOSEN	Licence No.	552
Telephone		Fax	09236884

Number of Accompanying Guests: 0
Are the trophies being exported after tanning and mounting? NO
Are the trophies being exported after primary treatment? YES

Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAW
Name of Shipping Agent		Address	
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Chishakwe	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	18-10-2019
Date of Safari To	28-10-2019
Daily Rate Charged For Big Game USD	150.00
Daily Rate Charged For Plains Game USD	150.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

1				
2				
3				
4				

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Cu
1				
2				
3				
4				

4. FINANCIAL DATA

Total Daily rate	1,500.00
Less Commission	.00
Other fees (Incidentals)	8,120.00
Percentage Commission Charged	.00

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM
1	BUFFALO	M	Killed	Chishakwe
2	ELAND	M	Killed	Chishakwe
3	LION	M	Killed	Chishakwe
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				

Ken Fryer

Q20. The total estimated distance (in kilometers) that hounds chased leopard during the

SECTION B: LION HUNT RETURN FORM

1. TR2 SERIAL NUMBER: 82437

2. HUNTING OUTFITTER: PZO SAFARIS

3. PROFESSIONAL HUNTER: ADAM GOOSEN

4. PROPERTY/CONCESSION/CAMPFIRE AREA NAME: CHISAKIMA

5. MINIMUM NUMBER OF DAYS BOOKED FOR LION HUNT: 12

6. i) BAIT & BLIND [✓] ii) ON FOOT [ ]

7. i) RIFLE [✓] ii) SHOTGUN [ ] iii) HANDGUN [ ] iv) BOW [ ]

8. i) SUCCESSFUL HUNT [✓] ii) FAILED HUNT [ ]

Complete question 9 if a hunt was unsuccessful

9. WAS A LION WOUNDED DURING A FAILED HUNT Y (N)

10. IF HUNT FAILED, WHAT WAS THE REASON?

11. TOTAL NUMBER OF BAIT NIGHTS: 5

12. NUMBER OF LIONS RECORDED ON BAITS

Sex/Age	Number	Evidence (sighting, tracks, trail camera)
Adult male	6	TRACKS / SIGHTINGS AND STEALTH CAM PICS
Adult female	7	
Subadult male	3	
Subadult female	4	
Unknown		

13. DATE OF HUNT START: 18.10.19

14. NUMBER OF DAYS INTO HUNT LION SHOT: 4

Complete questions 14-18 if a trophy was taken

15. GPS POSITION:

16. SKULL LENGTH (inches): 14 1/2

17. SKULL BREADTH (inches): 7 3/4

*Independent verification Y N (to be completed by ZPWMA)

18. ESTIMATED AGE OF LION TAKEN

i) <4 years [ ] ii) 4-5 years [ ] iv) ≥6 years [✓]

19. SEX OF LION HUNTED [✓] M F [ ]

COMMENTS

Total Daily rate	1,500.00
Less Commission	.00
Other fees (Incidentals)	8,120.00
Percentage Commission Charged	.00

Total Guests rate	
Total Trophy fees	9,500.00
Grand Total USD	19,120.00
Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI T S
1	BUFFALO	M	Killed	Chishakwe	36K014743	24-OCT-2019	
2	ELAND	M	Killed	Chishakwe	36K019715	27-OCT-2019	
3	LION	M	Killed	Chishakwe	36K083760	22-OCT-2019	
4							
5							
6							
7							
8							
9							
10							
11							
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14							
15							
16							
17							
18							
19							
20							

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.17 15:07:17 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 33696D

JENNA KING Digitally signed by JENNA KING Date: 2020.08.14 13:58:15 -04'00'

Enhancement Finding

Applicant: Kenneth B. Fryer (PRT–33696D)

Introduction

Kenneth B. Fryer submitted an application on March 21, 2019, for the importation of one male lion *(Panthera leo melanochaita)* taken on October 22, 2019, from the Savé Valley Conservancy (SVC), Chishakwe Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Kenneth B. Fryer hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Fryer's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Fryer himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Savé Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Fryer's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Fryer supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Fryer, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Fryer in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Fryer's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Fryer's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Fryer's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Fryer, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Fryer's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Fryer submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Fryer plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Fryer's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Fryer's permit request, we find that the expertise, facilities, or other resources available to Mr. Fryer appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Fryer's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Fryer's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Fryer on October 22, 2019, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Kenneth B. Fryer of San Luis Obispo, California.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / jan/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l l 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 14, 2020

Telephone Number: 850-797-1095

JENNA KING Digitally signed by JENNA KING Date: 2020.08.14 14:26:07 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 33696D, Kenneth B. Fryer, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requested U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.17 15:06:01 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA33696D-0
Effective: 08/17/2020 Expires: 08/16/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.18 09:39:16 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KENNETH B. FRYER M.D.
(b) (6)
SAN LUIS OBISPO, CA 93405
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2019 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2019 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

BEN B. WALLACE

February 19, 2019

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits
5275 Leesburg Pike
Falls Church, VA 22041-3803

RCVD MAR 04 2019

To Whom It May Concern,

I am applying for a two CITES permits. One is to harvest and import a leopard and the other is to harvest and import an African lion, both from Tanzania to the United States. The hunt will take place from August 16 to September 6, 2019. Please note my enclosed applications for each.

Also enclosed, please find two checks, each for $100, for the processing fee for each species.

Thank you for your consideration in advance.

Sincerely,

(b) (6) [redacted]

Benjamin B. Wallace

(b) (6) [redacted] CORPUS CHRISTI, TX (b) (6) [redacted]
(b) (6) [redacted]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 04 2019 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Wallace	Benjamin	Bird	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Corpus Christi	Texas	78401-2826	Nueces	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 12/20/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Ben B Wallace(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo, African Lion

b. Sex (if known). male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Tanzania - Rungwa Mpera Game Reserve, Manyoni District, Singida Region

b. Date wildlife is to be hunted:

August 16, 2019 to September 6, 2019

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Rungwa Game Safaris, Ltd., P.O. Box 13946, Arusha, Tanzania

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I have not hunted yet and do not currently hold any such permits.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see the information provided on the attached document.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Please see the information provided on the attached document.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see the information provided on the attached document.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ATTACHMENT TO

BENJAMIN BIRD WALLACE

FEDERAL FISH AND WILDLIFE PERMIT APPLICATION FORM

2019 LION

I realize that the U.S. Fish and Wildlife Service will evaluate each application in accordance with their permits issuance criteria at 50 CFR 17.32(a)(2). As described in the Endangered Species Act (ESA) special rule for threatened lions, you may consider factors such as those below [see 50 CFR 17.40(r)]. To the best of my ability, I have attempted to address each of them. The questions and answers below correspond to the ones on my application.

9.a. Do you have any information regarding population status or trend data on the species hunted?

According to the Tanzanian Wildlife Management Authority, Tanzania holds the most important lion population in Africa and on Earth. Approximately 50 percent of Africa's lion population (total of 16,800 lions) resides in Tanzania, with 56.8 percent of the lions being in hunting areas alone. Like the United States places great value on the conservation and management of private lands to benefit a diversity of species, Tanzania relies on these hunting areas for the protection of lions and their habitat. The Tanzanian Wildlife Management Authority and its research arm, the Tanzanian Wildlife Research Institute, have an ongoing program to monitor lion habitat and populations. While the population tend of lions in Rungwa is unknown, the population in another lion hunting area, the Selous Game Reserve, is stable. In the past few years, the offtake of lions due to a reduction in lion trophy hunting has declined approximately 40 percent. Tanzania greatly values both consumptive and non-consumptive uses of lions; its economy and conservation programs are dependent on the sustainable offtake of this species.

9.b. In order to hunt, you likely paid for license or trophy fees. What were those fees and do you have any information on how those funds were used either by the landowner, local community or government?

The trophy fee for an African lion in Tanzania is $16,500.00. Hunting is the major source of revenue for the Tanzanian Wildlife Management Authority. Fees generated from these hunts fund anti-poaching, habitat conservation, research, and conservation activities directly. Rungwa Game Safaris (RGS) works to reduce human-lion conflicts near its concession areas. RGS has programs established to assist village schools around the hunting areas with funding for projects to understand and respect native wildlife and how they are important to the community, both culturally and economically.

Again, RGS has donated medical supplies, televisions, and supplies to schools, assisted children who are malnourished by providing clean water to local villages through the use of its drilling rig, and has helped renovate wells to provide water versus increasing the risk of children to lions and crocodiles by removing water from local rivers. These efforts benefit the people living the villages surrounding RGS's concession areas.

9.c. Do you have information or other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

The management program in Tanzania and on the concession is based on sound, scientific principles. Julius Kambarage Nyerere, the first president of Tanzania, said, as part of The Arusha Manifesto, "...The survival of our wildlife is a matter of grave concern to all of us in Africa...these wild creatures amid wild places they inhabit are not only important as a source of winder and inspiration, but they're an integral part of our natural resources and our future livelihood and well being." As such, the Tanzanian Wildlife Management Authority strives to manage its wildlife in a scientific manner to improve the quality of life of its citizens. Furthermore, the management program at RGS is based on science and includes the taking of no more than one lion per 2000 square kilometers of concession area. The mission of RGS is "to conserve Tanzania's wildlife by effectively managing its precious resources so that our children and their children will be able to enjoy the natural heritage of Africa...wildlife."

The management program of RGS identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). RGS recognizes the threat of human encroachment to the loss of habitat in Tanzania. RGS works with local people, including the employment of them, in villages and surrounding areas as they are an integral part of ensuring that wildlife and its habitat loss are curtailed or at least minimized by understanding the direct economic benefit from hunting and wildlife-associated tourism. RGS has its own anti-poaching program which works in conjunction with the Tanzanian Wildlife Management Authority. RGS provides its team vehicles, fuel, food, equipment, allowances, rewards, GPS devices, radios, and various other expenses associated with anti-poaching. This joint program works continuously to protect the wildlife and human resources in and around the concession areas. Furthermore, it protects part of its hunting areas by not allowing the take of game in certain areas. RGS also funds infrastructure projects around the concession areas to improve road and bridge conditions to further help with anti-poaching efforts. RGS also invests in innovative, programmatic and results oriented conservation programs for local citizens so they further understand the many values (e.g., natural, cultural and economic) of wildlife and its habitat to Tanzania.

The management program of RGS actively addresses the loss of the lion's prey base by addressing poaching or unsustainable off take within Tanzania. The area of the lion

hunt will be the Rungwa Game Reserve. There are no people nor livestock living within the Reserve and is supported by the sustainable off-take of game at a minimum of a level as possible. Furthermore, RGS also invests conservation programs for local citizens so they further understand the importance of wildlife, including the lion and its prey base, as well as their habitat, to Tanzania. As a result of these combined activities, RGS has witnessed the annual improvement of wildlife populations and the quality of the hunting experience.

The Tanzanian Wildlife Management Authority has incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. The part of the Rungwa Game Reserve that the lion will be hunted has neither people nor livestock in or adjacent to it. However, RGS and the Tanzanian Wildlife Management Authority have programs established to assist the nearest village schools with funding for projects to understand and respect native wildlife and how they are important to the community, both culturally and economically. RGS believes that in order to practice wildlife conservation, the welfare of the local people that live near the concessions must first be addressed. For example, RGS has donated medical supplies, televisions, supplies to schools, assisted children who are malnourished by providing clean water to local villages through the use of its own drilling rig, and has helped renovate wells to provide water versus increasing the risk of children to lions and crocodiles by removing water from local rivers. These efforts benefit the people living the villages surrounding RGS's concession areas, furthering the link between the conservation of wildlife and its habitat, and the people.

RGS's management program works to ensure the long-term survival of the lion, its prey base, and habitat. The off-take number and the constant patrolling through the joint RGS's and Tanzanian Wildlife Management Authority's anti-poaching program ensures the long-term survival of the lion, thus benefitting local communities and villages from the revenue generated from the sale of lion hunts. Furthermore, Rungwa works to reduce human-lion conflicts near its concession areas.

Finally, a U.S. hunter's participation in the hunting program contributes to the overall management of lions within Tanzania. Hunters from the Unites States play a major role in the overall management of lions in Tanzania, both from a source of revenue and from the harvest of older lions not in a pride. Furthermore, U.S. hunters and RGS help with funding other activities previously stated to benefit schools and improve health, purchase educational and sporting equipment, purchase building materials, and improve agricultural conditions in local communities and help to alleviate poverty around RGS's concessions. Through RGS's help through teaching and experience, children can see first-hand that the conservation of wildlife and the protection of habitat leads to the increase in tourism and a better quality of live for themselves and their village

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-30784D

AUG 29 2019

Enhancement Finding
Applicant: Benjamin B. Wallace

I. Summary:

Mr. Wallace submitted an application on December 26, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Tanzania for the purpose of enhancing the propagation or survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion from Tanzania requires prior issuance of a CITES export permit from the CITES Management Authority of Tanzania, and import into the United States requires prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Tanzania, and other information available to the Service, the Service has determined that the importation of the sport-hunted trophy to be taken between August 16 and September 6, 2019, from either the Rungwa Mpera Game Reserve of western Tanzania or Selous Game Reserve K1 of southern Tanzania **meets** the enhancement criteria under 50 CFR 17.32.

The Service recognizes that legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. We consider whether the management program is actively addressing the current and longer term threats to the subspecies based on sound scientific principles. A management program for a species such as *P. l. melanochaita* is expected to address, at a minimum, an evaluation of population trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating whether the importation of Mr. Wallace's trophy of *P. l. melanochaita* would be authorized in accordance with our permit issuance criteria, we were particularly interested in examining how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We evaluated how, and how well, the hunting component of the management program addresses these threats by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. We also considered how the participation of a U.S. hunter, in this case, Mr. Wallace, contributes to the overall management of lions within a country.

We work closely with the range countries and interested parties to obtain relevant information. The government of Tanzania has provided a series of documents, including Tanzania's

"enhancement"[1] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Wallace's application, the Tanzania Wildlife Research Institute (TAWIRI), open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

II. U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule that, effective January 22, 2016, listed the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act (USFWS 2015; 80 Fed. Reg. 79999); this species is regulated under a species-specific 4(d) rule of the Act, which is set forth at 50 CFR17.40(r).

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the rule contains the applicable prohibitions and exceptions for the specific species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita* (50 CFR 17.40(r)), all of the prohibitions of 50 CFR 17.31 and permit provisions of 50 CFR 17.32 apply. The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of a commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out these otherwise prohibited activities, including importation, under certain circumstances (e.g., scientific purposes or activities that enhance the propagation or survival of the species), in accordance with the Service's regulations at 50 CFR 17.32. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild (USFWS 2015; 80 Fed. Reg. 79999); 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the issuance criteria under 50 CFR 17.32. However, in some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has made the required enhancement finding based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

[1] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

A. General ESA permitting requirements

As we explained when finalizing the 4(d) rule, our threatened species permitting regulations provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the population in the country where the specimen originated and whether that management of the population addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Tanzania contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of Tanzania's lion management plan provides a net benefit to the subspecies and its ecosystem. For example, several components of a management plan by which trophy imports could meet the issuance criteria might be government incentives in place that lead to increased habitat protection for lions by private landowners and communities, and incentives provided to local communities that lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions.

The Service evaluates an application involving a *P. l. melanochaita* sport-hunted trophy in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b), the following:

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

B. IUCN guiding principles

In addition to these factors, specifically in relation to sport-hunting, in the 4(d) rulemaking for *P.l. melanochaita*, the Service explained it considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P.l. melanochaita*. The Service has, therefore, considered these principles in conjunction with our threatened species issuance criteria in making our determination of enhancement concerning import of the sport-hunted *P. l. melanochaita* trophy that is the subject of this permit application. The IUCN document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources". It recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and, more specifically, the conservation of the hunted species.(IUCN SSC, 2012)

The IUCN document lays out the following five guiding principles:

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure

that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to developing enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the ESA. Before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

III. Basis for Finding:

As explained above, any person wishing to conduct an otherwise prohibited activity, including import of *P. l. melanochaita* specimens, must first obtain a permit as required by 50 CFR 17.32; issuance of an import permit for a sport-hunted trophy of *P. l. melanochaita* requires an enhancement finding.

The Service has made the required enhancement finding for this import permit based on this individual application to import a sport-hunted trophy of *P. l. melanochaita* taken in Tanzania. Additionally, as detailed below, relevant information obtained for Tanzania as a whole, has been considered. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"[2] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Wallace's application, the TAWIRI, open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

On April 14, 2016, the Service sent a letter to Mr. Herman Keraryo, Acting Director of Wildlife for the Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT), with a list

[2] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

of questions that would aid the Service in evaluating the overall conservation and management of the lion population in Tanzania, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to our April 14, 2016 letter, the MNRT provided a series of documents, including Tanzania's "enhancement" and non-detriment finding for lions.

Upon invitation, a U.S. delegation of Service personnel visited Tanzania in November 2018 to observe the challenges and successes of conserving wildlife, including lions, in Tanzania. This trip allowed first-hand exposure to the on-the-ground implementation of policies and procedures the government has put into place to conserve lions. Detailed discussions with government officials, national experts, land managers, game officers, village leaders, and leaders in the hunting industry, as well as site visits to different models of hunting operations, served to both substantiate and elucidate information provided in documents. We determined that the status of lions and the management approach of Tanzania are substantially as presented, conferring confidence to the conclusions drawn from information provided.

IV. Governance of Wildlife in Tanzania:

In Tanzania, wildlife resources, such as lions, are protected under several Acts of Parliament, establishing the authority for all aspects of wildlife management, including law enforcement activities. The **Wildlife Conservation Act** (WCA) of 2009, which replaced the original WCA of 1974, provides the legal framework for operation of the Wildlife Division under the MNRT, including the appointment of the Director of Wildlife. The WCA provides for the establishment of a Wildlife Protection Unit granted paramilitary status to protect wildlife against unlawful utilization, and a Wildlife Authority to manage all Tanzania wildlife located outside the boundaries of the National Parks and the Ngorongoro Conservation Area. The Wildlife Authority is also responsible for meeting international obligations involving wildlife conservation. The WCA ensures the protection of natural habitat and wildlife through the establishment of a network of Protected Areas (PAs), e.g., Game Reserves, Game Controlled Areas, Wildlife Management Areas, and areas such as wildlife corridors. The **National Parks Act** (CAP 282 R.E. 2002) establishes the legal authority for the creation and management of national parks, granting powers to the Director to enable maintenance and security within national parks, as well as the responsibility for the protection of their wildlife resources. The **Ngorongoro Conservation Act** (CAP 284 R.E. 2002) provides the legal framework for the existence of the multiple land use in the Ngorongoro Conservation Area, its Management Authority under the direction of the Conservator, and the authority for its maintenance and security. The **TAWIRI Act** (CAP 260 R.E. 2002) grants powers to the Director who is responsible for research involving wildlife, and for providing this information to the Wildlife Authorities.

The responsibility for managing Tanzania's wildlife currently falls primarily under four institutions. The **Tanzania Wildlife Research Institute** (TAWIRI) is responsible for conducting and coordinating wildlife research in Tanzania. It functions as the scientific authority for wildlife conservation and management, and the CITES Scientific Authority for Tanzania. The **Tanzania National Parks Authority** (TANAPA) is responsible for managing 15 National Parks with a

total area of 50,872 sq.km. In the national parks, only non-consumptive utilization (tourism game viewing) of wildlife resources is allowed. **Ngorongoro Conservation Area Authority** (NCAA) is responsible for management of only one area, the Ngorongoro Conservation Area, a protected area of 8,300 km^2. It is the only multiple land use wildlife area in Tanzania in which the consumptive utilization of wildlife is not permitted. Both TANAPA and NCAA are parastatal – public organizations, but not directly run by the government; all revenue is kept by the organizations for use in management of these areas.

The Wildlife Division has historically been responsible for the country's wildlife resources located outside the jurisdiction of the Ngorongoro Conservation Area and Tanzania National Parks. However, in response to concerns over questionable management practices and lack of adequate funding for the Wildlife Division to successfully manage wildlife resources, the **Tanzania Wildlife Management Authority** (TAWA) was established in 2014[3]. Also a parastatal organization, TAWA operates with significant autonomy and retains all revenue generated from hunting[4]. TAWA became operational in July 2016, and has since established an aggressive, proactive approach to protecting wildlife. In addition to conducting routine anti-poaching patrols, TAWA is actively building capacity with technology (e.g., GIS), relationships with local communities (e.g., intelligence-led operations), and collaborative efforts on an international scale.

TAWA is responsible for the management of 28 Game Reserves with an area of 112,564 km^2, approximately 38 Game Controlled Areas covering about 161,521 km^2, and Ramsar sites covering 249,856 km^2. There are also District Councils, local government institutions that work in collaboration with the TAWA. These councils oversee wildlife conservation issues and facilitate the establishment and management of Wildlife Management Areas (WMAs) on village lands.

WMAs were established as a new category of wildlife conservation areas consisting of settled and unsettled lands outside PAs, with the goal of allowing for rural communities and private landholders to manage wildlife on their land for their own benefit, shifting wildlife such as lions from a liability to an asset. The framework for WMAs was outlined in Tanzania's Wildlife Policy of 1998 (revised in 2007), with legislation established under the Wildlife Management Areas Regulations of 2002, authorizing the formal establishment of WMAs. From 2010 to 2014, over 1.3 million USD from hunting fees were disbursed to WMAs (TAWA, 2016). In 2012, Tanzania amended its Wildlife Management Area Regulations to provide a new basis for strengthening the links between local communities and wildlife management by addressing the issues of benefit sharing and control over concession allocations. Under the new regulations, the WMAs receive approximately 60-65% of the total hunting revenue occurring within the block. Additionally, WMAs gained the power to sign utilization contracts with the private sector, enabling seven WMAs to sign contracts with hunting operations worth more than 4.3 million USD (TAWA, 2016). The establishment of these WMAs has resulted in an additional 23,700 km^2 of Tanzania's land area being added to its conservation network and increased capacity for protected area management through the training of village game scouts and WMA managers.

The tourism industry, largely wildlife-based, contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates

[3] Prior to the establishment of TAWA, funding to the Wildlife Division was paid by the central treasury; inadequate funding left the Wildlife Division unable to effectively manage and protect Tanzania's wildlife resources.
[4] The mandate to collect and retain revenue from trophy hunting is enshrined in "The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order 2014.

almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations. The three parastatal organizations, TANAPA, NCAA and TAWA, retain 100% of their revenue share. Both TANAPA and NCAA are generally self-sustaining; consequently, National Parks and equivalent areas such as Ngorongoro Conservation Area, with an area covering approximately 38% of all PAs in Tanzania, are adequately funded. The sustainable utilization of resources (i.e., hunting) accounts for 70% of TAWA revenue; therefore, the viability of TAWA will depend, in part, on sufficient revenue from safari hunting. In 2012/2013, the Government of Tanzania re-established the Selous Game Reserve Revenue Retention Scheme, whereby 50% of the revenue generated from photographic tourism and tourist safari hunting is retained in order to meet management and enforcement costs in the Selous Game Reserve, one of the largest protected areas in Africa. Again, the viability of the Selous will depend, in part, on sufficient revenue from safari hunting.

Tanazania is a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Tanzania provided a copy of their CITES non-detriment finding (NDF) for lions, which finds that the export of the species will not be detrimental to the survival of the species in the wild.

Tanzania is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. As required of a member state, Tanzania has established management programs for the conservation and sustainable use of wildlife.

V. Status of Lions in Tanzania:

Approximately 40% of all lions in Africa are found in Tanzania (Riggio et al., 2013). The lion range in Tanzania covers over 90% of land (Mesochina et al., 2010), with four main subpopulations:

1. the Maasailand Ecosystem, which encompasses the Mara, Arusha Kilimanjaro and Manyara Regions of northeastern Tanzania;
2. the Kagera and Kigoma Regions of northwestern Tanzania;
3. the Rukwa, Tabora and Mbeya Regions of central and western Tanzania;
4. Selous Ecosystem, which encompasses the Lindi, Morogoro and Ruvuma Regions of southern Tanzania.

TAWIRI presents Tanzania's latest lion population estimates as 16,800 individuals (Mesochina et al., 2010), and 17,564 (12,208-19,320) (Ikanda & Packer, 2006). They estimate that 13,600 (or 81%) of these lions occurred within PAs and approximately 3,200 (or 19%) individuals occurred outside PAs. According to Riggio et al. (2013) and Björklund (2003), the minimum number of lions estimated to categorize an area as a lion stronghold is 500 individuals. The estimated population size of the four main lion ecosystems was 3,700 in the Maasailand Ecosystem, 520 in Kagera and Kigoma Regions, 2,300 in Rukwa, Tabora and Mbeya Regions, and 7,200 in the Selous Ecosystem.

Trend analysis of the lion population in Tanzania is limited due to the sporadic nature and variable methodology of past surveys, as well as the difficulty of obtaining precise lion counts (Brink, Smith, & Skinner, 2013; Funston et al., 2010), but it is suggested that, nationally, far fewer lions exist today than did 50 years ago (Ikanda, 2008). Available information suggests that this may be spatially variable, e.g., declining populations in Katavi and Tarangire (Bauer et al., 2015) and stable populations in the Selous Game Reserve (Packer et al., 2011).

VI. Management of Tanzania's Lion Population

In recognition of the role that Tanzania plays in the conservation of this species, a workshop was held in 2006 to assess available information and to set priorities for conservation of the lion in Tanzania. The Tanzania Lion and Leopard Conservation Action Plan (TAWIRI, 2009) provided an overview of this workshop and outlined a national strategic plan for lion conservation. Habitat loss and increased conflict with humans had been identified as the major threat to the species. The Tanzania Lion and Leopard Conservation Action Plan (Plan) concluded that, for those lion populations existing outside National Parks, well-run trophy hunting programs could be leveraged to successfully manage and conserve lions against these threats. To that point, the majority of permanent lion range in Tanzania lies within protected areas, 61% of which are designated as hunting areas (Mesochina et al., 2010).

A. Hunting:

Hunting of lions is allowed across much of Tanzania. Safari hunting occurs in areas known as hunting blocks, designated in Game Reserves, Game Controlled Areas, Open Areas, Forest Reserves and WMAs. Until recently, blocks were allocated using an administrative process. The government would invite hunting companies to apply to operate a hunting block; interested hunting companies were evaluated by the Hunting Block Advisory Committee. Hunting companies were allocated blocks for a period of five years, with a reporting requirement on the third year to determine compliance under the terms outlined within the hunting block regulations (TAWA, 2016). However, in 2017, it was announced that the block allocation process would be amended to introduce an auction system.

Wildlife hunting in Tanzania is based on hunting regulations set forth in Tourist Hunting Regulations No. 306 (2002). The regulations specify the fees for hunting different species, and further specify a minimum number of hunting days. Hunters are required to purchase a minimum 21-day safari in order to request a permit for the harvest of lions, as well as other specified animals (e.g., elephant, leopard). Hunters must pay a number of different fees for permits and licenses to be granted harvest authorization. The game fee to hunt a lion is the second highest game fee in Tanzania, second only to elephants.

A quota system historically was the primary method of regulating trophy hunting in Tanzania. Annual harvest quotas have been lowered over the past decade, from 520 in 2008-2009 (Lindsey et al., 2013) to 315 in recent years (TAWA, 2016). In 2016, the annual quota was further reduced to 200 individuals (TAWA, 2016). An annual quota of 200 individuals is well within the suggested sustainable 1 lion/2000 km^2 harvest rate identified by Packer et al. (Packer et al., 2011), and 25% below the sustainable harvest level suggested by TAWIRI (TAWA, 2016). However, the Plan noted the lack of scientific justification underlying that system. Furthermore, a quota system is reliant on

accurate population estimates, a near impossibility with lions. A model that simulated the dynamics of populations as a function of both quota size and age at harvest showed that there is almost no negative affect on population size when hunting is restricted to males six years or older (Whitman, Starfield, Quadling, & Packer, 2007). Restricting lion hunting by age would reduce the reliance on population estimates – an intensive and expensive effort that does not reliably return accurate results – while minimizing the effect on a lion population. Tanzania was the first country in African lion range states to officially establish age restriction rules, prohibiting hunting lions of an age below six years (section 27(1) of the Tourist Hunting Regulations of 2015). Violations of this regulation can result in penalties for the professional hunter guiding the offending hunter, including fees and revoking of the professional hunter's license.

Although inspection of trophies are required prior to export, the fundamental difficulties of accurately estimating lion age, as well as a disregard for these regulations, can result in the take of lions younger than six years. Tanzania has consequently maintained a quota system, set by hunting block according to the lions harvested during the previous hunting season. If a trophy lion is estimated to be 4-6 years, the hunter/client may export that lion, but the quota for the hunting block where the trophy was taken is reduced for the following hunting season. If a trophy is taken below the age of 4, there is a reduction of the hunting block's quota of harvestable lions by 2 and potential cancellation of the hunter's license along with other penalties such as the trophy not being eligible for export. If the trophy meets the criteria of 6 years of age or older, the hunting block's quota remains unchanged for the following hunting season. According to MNRT, these regulations have been in place since the 2012/2013 hunting season. For each trophy harvested, a compulsory hunter evaluation form, photos along with presentation of lion skull to officials for inspection and measurements, including tooth x-rays, are necessary prior to the issuance of an export permit (MNRT, 2015; TAWA, 2016).

B. Human-Lion Conflict:

It is difficult to estimate how many lions are killed illegally each year; however, retaliatory killings may be as high as 200 individuals annually (TAWA, 2016). Lions are provided protection from illegal or retaliatory killing under the Fourth Schedule due in part to human/livestock-conflict under the Dangerous Animals Damage Consolation (Government Notice No. 146) of 2011; unauthorized personnel are not permitted to kill a conflict lion unless under exceptional circumstances. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

VII. Evaluation:

In evaluating whether the importation of Mr. Wallace's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our permit issuance criteria, we examined how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We considered whether the management program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We evaluated government incentives designed to increased habitat protection for lions by private

landowners and communities, and incentives provided to local communities designed to lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions. We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. As such, we examined if the trophy hunting provides financial/resource assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how a U.S. hunter's, in this case, Mr. Wallace's, participation in the hunting program contributes to the overall management of lions within the country.

As stated earlier, the Service has evaluated this application in accordance with our regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine for this application that the import of the wild lion trophy animal would enhance the propagation or survival of the species in the wild and qualifies for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the proposed activity in this permit application (import of a trophy hunted lion from Tanzania) has demonstrated the ability to contribute towards positive conservation outcomes that mitigate or improve the status of lions throughout their range while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion that collectively contribute towards continued population declines.

Tanzania faces a growing human population, and a subsequent development of land and increasing rates of human-wildlife interactions. Protection of suitable habitat for both the lion and its prey is essential for the survival of the lion, as well as developing and sustaining the local communities' support for such policies. Wildlife protected areas, in various forms, cover about 40% of Tanzania's land area, and safari hunting has created a financial incentive to maintain these protected areas as a land use. Both the consumptive and non-consumptive utilization of wildlife resources contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations.

The companies awarded a hunting block are in a key position to conserve this land for wildlife, and are annually evaluated by the Tanzania government on several criteria, including the maintenance of prey populations, contributions/provision of benefits to the local villages, improvement to infrastructure, protection of the environment, and anti-poaching operations.

Mr. Wallace will hunt with Rungwa Game Safaris. Rungwa Game Safaris has developed several programs by which to address the main threats to lion populations.

- The company has vowed a large portion of its income to anti-poaching. This is viewed as an investment rather than an expense. The company deploys its own anti-poaching units several times a month in each hunting area. Each anti-poaching unit is provided a vehicle, food rations, and other equipment to be successful in their patrols. Anti-poaching patrols are conducted year-round.

  The company dispatches road construction teams several months before the beginning of the hunting season. Since 2016, more than 496 kilometers of new roads have been opened. Reopening established roads and opening new roads enables the anti-poaching units to effectively patrol the area and extend the hunting range used by the hunters.

- To ensure a sustainable off take of prey base species, the company works closely, under the advice of its knowledgeable professional hunters, with the Ministry of Natural Resources and Tourism to recommend conservative quotas. The company policy is for a minimal off take with selective harvest of only mature males.

- The company's professional hunters are required to sign a contract that outlines their duties and obligations. The professional hunter contract ensures a sustainable management program by:
  - Requiring the professional hunter to know the law and regulations regarding hunting in Tanzania and abide by them;
  - Prohibiting the harvest of a male lion under 6 years old;
  - Prohibiting the harvest of any immature buffalo;
  - Requiring the harvest of only old and mature animals;
  - Prohibiting the harvest of any female or pregnant animal; and
  - Prohibiting any other illegal or unethical hunting practices.

- The company maintains a lion record to prevent the harvest of a pride male lion. Professional hunters are provided with trail cameras. Trail camera pictures are compiled and entered into the record, and the professional hunters use this record when evaluating potentially huntable lions to avoid underage and pride males.

It has been stated that upwards of 200 lions are killed annually due to preemptive strikes or as retaliatory actions after some form of direct loss is experienced by an individual or community (TAWA, 2016). In the Ruaha communities surrounding hunting blocks and the Ruaha National Park, researchers reported 35 large carnivores were killed over an 18-month period. Similarly, Lichtenfeld et al. (2015) reported that in 12 communities of the Maasai Steppe region, more than 50 attacks by large carnivores on livestock resulted in retaliatory killing of 72-84 lions. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

As described above, we have determined that the government of Tanzania and Rungwa Game Safaris contribute towards positive conservation outcomes by addressing the main threats of

habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Tanzania. Further, the fees garnered through Mr. Wallace's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

A myriad of issues and factors, largely related to an increasing human population, complicate and put at risk the management of Tanzania's wildlife (Kideghesho, Rija, Mwamende, & Selemani, 2013). It is likely that the lion populations that exist outside of protected areas will continue to decline (Riggio et al., 2013), making the existence of these protected areas all the more important. The trophy-hunting program in Tanzania provides a revenue source necessary to maintain and manage protected areas from encroachment or elimination.

It is a widely supported belief that increasing the benefits for those who live with and bear costs of wildlife damage or injury by wildlife can increase tolerance of wildlife, especially of large carnivores (e.g. lions) (Bencin, Kioko, & Kiffner, 2016; Lindsey et al., 2013; Winterbach, Winterbach, Somers, & Hayward, 2012). Mr. Wallace will hunt with Rungwa Game Safaris, which, as outlined below, will provide an indirect benefit to the lion population by generating revenue to help support and maintain a hunting block where lions are found. Rungwa Game Safaris is required by Tanzanian law to pay directly a $5,000 community development fee to the villages in the hunting area. Every year, the company meets and exceeds its mandatory $5,000 area community development fee obligation through various initiatives to improve the educational environment of local villages, including materials for construction, desks, and classroom materials.

In addition to the contributions made by Mr. Brar's company, American hunters have played a huge role in the villages. Almost every American hunter comes with school and medical supplies, clothes, shoes, and sports equipment. Furthermore, some hunters choose to leave cash that is directly donated to the village schools. Tens of thousands of dollars worth of supplies and cash have been contributed to the villages by American hunters.

In addition to direct financial assistance, the company employs 150 camp staff, four professional hunters, and four administrative personnel. Even though the hunting season lasts from July to December, the company believes it is their corporate social responsibility to employ their staff year-round. Approximately, 25% of camp staff is comprised of individuals from the neighboring communities. The company further supports the neighboring communities by hiring casual laborers for construction and road opening. Through this employment and by maintaining community development projects and funding, the company has built and maintained a strong relationship with neighboring villages.

The company maintains a program of contributing game meat to villagers located within and next to the hunting area. An estimated 30% of the total game meat harvested throughout the season is donated to the local communities as well as to the government anti-poaching units. Doing so

provides the villagers with a much needed source of protein and discourages indiscriminate meat poaching.
Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

The government of Tanzania has implemented a number of policies and regulations to monitor and control the harvest of lions in the country. Therefore, the issuance of an import permit for a lion legally hunted in Tanzania does not conflict with any programs intended to enhance the survival probably of the species in Tanzania.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, almost 40% of all remaining lions are found in Tanzania. The lions located within protected areas are under the legal authority of MNRT, as well as subjected to direct management activities by hunting companies. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the maintenance of these protected areas by hunting companies is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. The cost of operating a hunting block is considerable, and lion safaris are a large source of revenue for hunting companies. This revenue is, in part, what allows the company to first and foremost maintain a presence in this protected area, and subsequently maintain an anti-poaching program, and to aid in local community development, all factors which reduce the threats faced by lions.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt proposed in Mr. Wallace's application contributes to reducing the threat of extinction of lions in Tanzania. The utilization of hunters such as Mr. Wallace in supporting the safari hunting industry is an important element of the success of lion management in Tanzania.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduce the threat of extinction facing lions in Tanzania.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a

scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that legal and sustainable harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

The long-term survival of lions in Tanzania is tied directly to the success, both ecologically and economically, of the protected areas. Based on our understanding of the hunting block allocation and management, companies must submit annual reports that address several criteria, including the maintenance of key prey populations, contributions to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

Therefore, based on the information available to the Service, the applicant will hunt on a hunting block that carries out their management practices in accordance with national regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

VIII. Conclusion

As stated earlier, this application received by the Service for the import of a sport-hunted trophy lion from Tanzania has been evaluated on an individual basis. The major threat facing lions today is the loss of habitat to humans, and the subsequent consequences of living among humans (e.g., decrease of prey base due to bush-meat consumption, increase in human-lion conflict). The occupation and maintenance of hunting areas by hunting concessions -- an industry supported by U.S. hunters such as Mr. Wallace -- protects lion and prey habitat through legal hunting by preventing conversion of such land to other uses, thereby contributing to the enhancement of this species. In addition, the financial benefits to local communities generated from lion safari hunting creates incentives for protection of lions, resulting in fewer lions lost as a result of human-lion conflict, which further contributes to enhancement of this species. Given the status of lions in Tanzania and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant will hunt on a hunting block that is actively managing lions in a manner that mimics natural processes. The applicant attests in the application that the hunt will occur on a properly licensed hunting block, and this finding is contingent on the hunting block where the lion will be taken, having been properly licensed and fully in compliance with national and local regulations.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of the sport-hunted trophy of this wild lion will enhance the propagation or survival of the species in the

wild. Therefore, the Service **is able to authorize the import of one male trophy lion taken from the wild in Tanzania, to Benjamin B. Wallace, Corpus Christi, Texas.**

Julia Butzler, Ph.D., Senior Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Ph.D., Chief
Branch of Permits
Division of Management Authority

References

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L. T. B., . . . Packer, C. (2015). Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. *Proceedings of the National Academy of Sciences of the United States of America, 112*(48).

Bencin, H., Kioko, J., & Kiffner, C. (2016). Local people's perceptions of wildlife species in two distinct landscapes of northern Tanzania. *Journal for Nature Conservation, 34*, 82-92.

Björklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (*Panthera leo*). *Conservation Genetics, 4*(4).

Brink, H., Smith, R. J., & Skinner, K. (2013). Methods for lion monitoring: A comparison from the Selous game reserve, Tanzania. *African Journal of Ecology, 51*(2).

Funston, P. J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A., Macdonald, D. M., . . . Ferreira, S. M. (2010). Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology, 281*(1), 56-65.

Ikanda, D. K., & Packer, C. (2006). *Lion abundance and distribution in Tanzania - A status report to the Wildlife Division.* Unpublished manuscript.

Ikanda, D. K. (2008). *Non-detriment report under CITES regarding the export of African lions (Panthera leo) from the United Republic of Tanzania.* NDF Workshop Case Studies, WG5 - Case study, 20 pages.

IUCN SSC. (2012). *IUCN SSC guiding principles on trophy hunting as a tool for creating conservation incentives. ver. 1.0.* IUCN, Gland.

Kideghesho, J., Rija, A., Mwamende, K., & Selemani, I. (2013). Emerging issues and challenges in conservation of biodiversity in the rangelands of Tanzania. *Nature Conservation, 6*(18), 1-29.

Lichtenfeld, L., Trout, C., & Kisimir, E. (2015). Evidence-based conservation: Predator-proof bomas protect livestock and lions. *Biodiversity and Conservation, 24*(3), 483-491.

Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., . . . Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PLoS One, 8*(9).

Mesochina, P., Mbangwa, O., Chardonnet, P., Mosha, R., Mtui, B., Drouet, N., . . . Kissui, B. (2010). *Conservation status of the lion (Panthera leo linnaeus, 1758) in Tanzania.* Paris.

MNRT. (2015). *Comment on ESA status review of African lions, January 27, 2015*. Ministry of Natural Resources and Tourism, Dar es Salaam.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H., & Caro, T. (2011). Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology, 25*(1).

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., . . . Pimm, S. (2013). The size of savannah Africa: A lion's (*Panthera leo*) view. *Biodiversity and Conservation, 22*(1).

TAWA. (2016). *Non-detriment findings on African lion (Panthera leo) in the United Republic of Tanzania, including enhancement findings*. Tanzania Wildlife Management Authority, Tanzania.

TAWIRI. (2009). *Tanzania carnivore conservation action plan*. TAWIRI, Arusha, Tanzania.

Whitman, K. L., Starfield, A. M., Quadling, H., & Packer, C. (2007). Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions. *Conservation Biology.*

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Wallace	Benjamin	Bird	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Corpus Christi	Texas	78401	Nueces	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and [illegible]stand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 07/22/2020

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   BENJAMIN B WALLACE, (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA30784D-0

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit

      Permittee's signature: (b) (6) Date: 7/22/2020

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports **(where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.**

Re: [EXTERNAL] call

Cogliano, Mary <mary_cogliano@fws.gov>
Fri 7/31/2020 3:38 PM

To: jcummins@wildlifemiss.org <jcummins@wildlifemiss.org>; Seidman, Anna M <anna_seidman@fws.gov>
Cc: Bell, Gloria <gloria_bell@fws.gov>; Ben Wallace <(b) (6) >

Hi Jim,

Thank you for reaching out. I will look into this for you and get back to you before the end of the day today.

Best regards,

Mary

Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
703-358-1991
USFWS | International Affairs

From: James L. Cummins <jcummins@wildlifemiss.org>
Sent: Friday, July 31, 2020 3:33 PM
To: Seidman, Anna M <anna_seidman@fws.gov>
Cc: Bell, Gloria <gloria_bell@fws.gov>; Ben Wallace <(b) (6) >; Cogliano, Mary <mary_cogliano@fws.gov>
Subject: Re: [EXTERNAL] call

Thanks Anna. Mary signed the original permit for Ben. I am glad to talk to Mary.

Mary, should we ask Agent Wilson to send the extension request to you?

Sent from my iPhone

> On Jul 31, 2020, at 1:53 PM, Seidman, Anna M <anna_seidman@fws.gov> wrote:
>
> James:

I've got back to back meengs this a . ernoon, but I will try to give you a call when I'm done. In the meanme, I am including m y Chief of the Branch of Permits so that she is aware of what's going on.

Thanks,

Anna

Anna M. Seidman
U.S. Fish and Wildlife Service
Assistant Director - Internaonal Aff airs
anna_seidman@fws.gov
Cell: 571-480-0410

From: James L. Cummins <jcummins@wildlifemiss.org>
Sent: Friday, July 31, 2020 2:02 PM
To: Seidman, Anna M <anna_seidman@fws.gov>
Cc: Bell, Gloria <gloria_bell@fws.gov>; 'Ben Wallace' (b) (6) >
Subject: RE: [EXTERNAL] call

Thanks Anna.

It is about a permit extension for Benjamin Bird Wallace (MA30784D-0). I am helping him. Ben was issued this permit on 08/29/2019 and it expires on 08/28/2020. He harvested the animal in 2019 and due to COVID-19, the government of Tanzania has been delayed on shipping it to the US (Houston, TX).

I placed a call into the Division of Management Authority in Falls Church two weeks ago to make sure Form 3-200-52 was the correct form, but did not receive a return call (which I understand with the pandemic and remote working). Ben completed the form (3-200-52) to extend the time of the permit and on Friday, July 24, 2020, he sent it overnight (with the applicable fee) to the Region 2 office of the USFWS (as stated on page 4 of the permit application) for Monday (July 27) delivery).

He received a call from an Agent Wilson (Ph: 505-377-9818) in the Region 2 Office on yesterday. She stated that she had received the application to amend the permit (time extension only) and that her office no longer processes these permits any more.

We need to get that office to send the application to your office, or the appropriate office. If they shred it (as she said was an option) and we have to start over, we will not be within the 30 days required to request an extension.

Just need some guidance. I understand your statement and if not you, I would appreciate if someone else could call me @(b) (6) , or help us.

Thanks Anna. Hope you are enjoying your new job.

James

From: Seidman, Anna M [mailto:anna_seidman@fws.gov]
Sent: Friday, July 31, 2020 12:40 PM
To: jcummins@wildlifemiss.org
Cc: Bell, Gloria
Subject: Re: [EXTERNAL] call

James:

I would be happy to, but could you please do me a favor? Could you give me an idea of what you would like to discuss? I need to make sure that our discussion is not within any of the subjects from which I must temporarily recuse myself. If it is, I will make sure to arrange for you to talk with another person in IA.

Thanks. I look forward to hearing back from you so we can schedule a call.

Anna

Anna M. Seidman
U.S. Fish and Wildlife Service
Assistant Director - Internaonal Aff airs
anna_seidman@fws.gov
Cell: 571-480-0410

From: James L. Cummins <jcummins@wildlifemiss.org>
Sent: Friday, July 31, 2020 1:19 PM
To: Seidman, Anna M <anna_seidman@fws.gov>
Subject: [EXTERNAL] call

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Anna,

Good afternoon.

Can you please give me a call @ (b) (6)

Thanks!

James

<image001.jpg>
James L. Cummins
Executive Director
(b) (6)

Form 3-200-52

OMB No. 1018-0093
Expires 08/31/2020

RCVD AUG 06 2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Wallace	Benjamin	Bird	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Corpus Christi	Texas	78401	Nueces	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

07/22/2020

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
BENJAMIN B WALLACE, CELL (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA30784D-0

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permi

      Permittee's signature: [redacted] Date: 7/22/2020

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

copy of original permit

LION TANZANIA ESA TROPHY

Permit Number: MA30784D-0
Effective: 08/29/2019 Expires: 08/28/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coogliano
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

BENJAMIN BIRD WALLACE
(b) (6) [redacted]
CORPUS CHRISTI, TX 78401
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2019 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2019 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Tanzania.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

LION TANZANIA ESA TROPHY

Permit Number: MA30784D-1
Effective: 07/31/2020 Expires: 07/30/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

MARY COGLIANO
Digitally signed by MARY COGLIANO
Date: 2020.07.31 19:38:45 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
BENJAMIN BIRD WALLACE
(b) (6)
CORPUS CHRISTI, TX 78401
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

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G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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June 25, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

Re: Application for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find three import permit applications. The first is for a permit to import a sport-hunted elephant trophy from the Mahango Game Park concession in Namibia. The Mahango area is part of the Zambezi Region of Namibia, and holds the country's largest elephant population, which is increasing. (See enclosed AfESG Status Report.) This operator, Thormahlen & Cochran, has been in business almost two decades and has carefully stewarded this concession. We will be submitted a report from this operator by separate cover. Please consider this information, as well as information in the DMA's files and submitted by Conservation Force and Namibia's Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant, who has two separate application forms, is hunting lion, elephant, and leopard on Sango Ranch in the Save Valley Conservancy in Zimbabwe. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority have submitted extensive documentation about the healthy elephant and lion population in SVC and the benefits generated by regulated hunting. Please refer to that information, including the October 2016 Non-Detriment Finding and January 2016 report, describing the SVC's strong wildlife management. Please also see the attached declaration from Wilfried Pabst. This declaration was not ultimately submitted in court, but it remains a sworn statement that reflects the healthy wildlife populations in SVC. Please consider all this information in making positive enhancement findings and non-detriment findings for this applicant.

Please do not hesitate to contact us if you have questions about these applications or need further information.

Sincerely,

Regina Lennox

Encl:

- AfESG Status Report (2016), excerpts for Namibia and Zimbabwe
- Willy Pabst, Owner of Sango Ranch, Declaration

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD JUL 3 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Noble	Samuel	Edward	JR

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (include if different than mailing address; include name of contact person if applicable; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Scottsboro	Alabama	35769	Jackson	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ...ment herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

6/13/2018

Signature of applicant/principal officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Samuel Noble, JR
(b) (6) [redacted]
Scottsboro, AL 35768

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

(1) Loxodonta Africana Elephant
(1) Panthera leo melanochaita Lion

b. Sex (if known). male + male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Sango Ranch, Save Valley Zimbabwe - Masvingo

b. Date wildlife is to be hunted:

June 22 - July 11 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Zambezi hunters

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Winston Taylor
Business Name: Zambezi Hunters
Address: P.O. Box BW 1330 Borrowdale
City: Harare
State/Province: Zimbabwe
Country, Postal Code:
– Tel: 263.4.882223

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b) (6) Date: 6/13/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

COUNTRY

Zimbabwe

ESTIMATED TOTAL ELEPHANTS

82,630 ± 8,589

GUESSES

1,635 - 1,805

GENERAL STATISTICS

Country Area	390,580 km²
Range Area	81,228 km² (21%)
Protected Range	61 %
Information Quality Index (IQI)	0.86
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Poaching of elephants for ivory has escalated in the past ten years and has become a major problem in Zimbabwe. A worrying recent development has been the emergence of poisoning as a poaching technique. Just over 100 elephants were killed in a single cyanide poisoning incident in Hwange National Park in late 2013 (Muboko et al., 2014). The impact of poaching has been highest in the north of the country, particularly in the Sebungwe Region to the south of Lake Kariba, and the Lower Zambezi Region (Dunham et al., 2015c). Although elephant numbers have increased in Gonarezhou National Park, it too experienced an increase in poaching in 2015 (Dunham & van der Westhuizen, 2015).

Concern has been expressed about the impact of high numbers of elephants on vegetation and other biodiversity in Zimbabwe's protected areas. Despite the increase in poaching, this remains a problem in protected areas such as Hwange NP, where the provision of artificial water supplies has led to high elephant densities (ZPWMA, 2015).

Zimbabwe published a national elephant management plan covering the period 2015 to 2020 (ZPWMA, 2015).

In 2008, Zimbabwe undertook an approved one-off sale of 3,764 kg of ivory to Japan and China, at a price of USD $487,162 (Wijnstekers, 2011).

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km^2, which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

suitable for comparative purposes (Dunham et al., 2007; Dunham et al., 2006b). Since the 2014 Botswana survey was carried out a month earlier than the north-west Matabeleland survey there is a possibility of double-counting or missing animals that had moved from Hwange into Botswana. There was a surprisingly large number of elephants seen in the Ngwasho/Sepako stratum in Botswana adjoining the southern half of Hwange NP (estimate 11,744) (Chase et al., 2015) and evidence from radio-tracking shows that elephants do move out of Hwange into adjoining areas of Botswana (Chamaillé-Jammes, pers. comm., 2016; Ferguson & Chase, 2010).

Elephant range in North-west Matabeleland has probably increased. Water hole counts and scout reports indicated 308 elephants in the Fuller Forest Land, 165 in Gwaai, Bembezi and Umguza Forest Lands (which has been marked as new **known range**) and 150 in Gwampa/Lake Alice Forest Reserves (M. Sebele pers. comm in Dunham et al., 2015a) which are all recorded as **new populations**. I. Du Preez (pers. comm. in Dunham et al., 2015a) reported an **informed guess** of 36 elephants in the privately owned Stanley & Livingstone Game Reserve (Nakavango).

The estimate for Gonarezhou NP from the 2014 survey was 11,120 ± 2,709 (Dunham & van der Westhuizen, 2015). This replaces an estimate of 4,987 ± 1,577 from a comparable 2001 survey. Another survey in 2009 gave an estimate of 9,123 ± 1,898 (Dunham et al., 2010). The elephant population of Gonarezhou NP is continuing to increase, and is at its highest level since surveys started in 1980. There was a relatively low carcass ratio of 4%. There are limited movements of elephants from Gonarezhou into adjoining parts of Mozambique, and one radio-collared elephant moved from Kruger to Gonarezhou (Henley, 2011).

The 2014 survey of the south east Lowveld included some neighbouring areas. No elephants were observed in the Malapati Safari Area immediately south-west of Gonarezhou but there was an estimate of 332 ± 519 in the Mahenye communal land to the north-east of Gonarezhou, which replaces a zero estimate from the 2001 survey. The 2014 survey gave an estimate of 1,585 ± 1,295 for the Savé Valley Conservancy. This replaces an estimate of 527 ± 310 (Dunham, 2003). There is no statistical difference between the two results. Aerial total counts were carried out in 2013 and 2015 (Jooste & Lenton, 2015; Joubert & Joubert, 2013), which did not cover the entire area; 1,538 and 1,490 elephants were counted respectively. Sengwe, further to the south-west, adjoining the northern boundary of Kruger National Park in South Africa, was not counted in the 2014 survey, but there was an estimate of 35 ± 99 in 2013 (Dunham et al., 2013). In the Malilangwe Conservancy 272 elephants were counted using a helicopter in 2013 (Clegg, 2013). This replaces an estimate of 116 from an aerial total count in 2001 (Dunham, 2002). There was an estimate of 55 in 2014 for the Chiredzi River Conservancy (Warth in Dunham & van der Westhuizen, 2015) compared to 28 in 2001 (Dunham, 2002). Although Chipinge Safari Area is marked as possible elephant range, this is now highly unlikely.

There are a number of small isolated populations in other parts of Zimbabwe, which have updated estimates for 2014. There is an informed guess of 150 elephants for Chegutu Safari Area (Mwale, pers. comm. in Dunham, 2015), formerly Hartley Safari Area, west of Harare and this replaces a guess of 100 from 2001 (Dunham & Mackie, 2002). Some 30 elephants reportedly move from the Nyatana Wildlife Management Area in the north east of the country into Mozambique and this replaces a guess of 150 from 2001 (Dunham & Mackie, 2002).

Some 20 bull elephants were photographed, and there was a further unverified report of 40 elephants, near Mangwe Dam in the vicinity of Home Farm and Greystone Ranches, across the border from Francistown in Botswana (Robertson and Winch, pers. comm. in Dunham, 2015) replacing a guess of three from 2002 (Dunham & Mackie, 2002). A helicopter total count enumerated 174 elephants on Shangani Ranch near Bulawayo (Edwards, pers. comm. in Dunham, 2015) and this replaces a guess of 60 from 2001 (Dunham & Mackie, 2002).

There was a **total aerial count** of 212 elephants in 2014 in the Zimbabwe section of the Mapungubwe Transfrontier Conservation Area which includes Tuli Safari Area, Sentinel, Nottingham and River Ranches (Selier & Page, 2015). This replaces an estimate of 82 from 2001 (Dunham & Mackie, 2002).

There were **informed guesses** in 2014 of 500-600 in Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Total Counts	484	–	–	–	1 %	819
Aerial Sample Counts	82,126	8,589	–	–	81 %	65,502
Informed Guesses	20	–	527	567	5 %	3,777
Other Guesses	–	–	1,091	1,221	10 %	8,399
Degraded Data	–	–	17	17	0 %	342
Totals 2015	**82,630**	**8,589**	**1,635**	**1,805**		
Totals 2006	**93,122**	**7,068**	**534**	**625**		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
Total Range					100 %	81,228

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	-10,320	±11,124	0	0	79 %	63,868
New Population	0	0	+713	+713	6 %	4,563
Different Technique	+7	±99	-145	-145	4 %	3,370
Different Area	+20	0	-3	+36	0 %	33
New Guess	-182	0	+519	+559	8 %	6,662
Data Degraded	-17	0	+17	+17	0 %	0
Totals	-10,492	±11,124	+1,101	+1,180	97 %	78,839

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Aerial or Ground Total Counts	819	0	819
Direct Sample and Reliable Dung	65,375	127	65,502
Informed Guesses	3,745	32	3,777
Other Guesses	8,741	0	8,741
Unassessed Range	1,533	857	2,389
Totals	80,213	1,016	81,228

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Selier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

ELEPHANT ESTIMATES (CONT.)

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON	LAT
Matusadona National Park	RS	AS	B	2014	669	251	Dunham et al., 2015b	2	1,366	28.2°E	17.4°S
North Gokwe Communal Lands	RS	AS	B	2014	0	21	Dunham et al., 2015b	2	3,096	28.2°E	17.4°S
Sijarira Forest Area	RS	AS	B	2014	16		Dunham et al., 2015b	3	261	28.2°E	17.4°S
Shangani Ranch	NG	O	E	2014	174		Dunham, 2015	2	628	29.3°E	19.6°S
Southeast Lowveld											
Bubiana Conservancy	NG	O	E	2014	100		Dunham, 2015	2	1,772	29.8°E	21.1°S
Bubye Valley Conservancy	NG	O	E	2014	500	100*	Dunham, 2015	1	2,895	30.1°E	21.5°S
Chiredzi River Conservancy	DT	O	E	2014	55		Dunham, 2015	2	895	31.6°E	20.8°S
Gonarezhou National Park	RS	AS	B	2014	11,120	2,709	Dunham & van der Westhuizen, 2015	1	4,941	31.9°E	21.5°S
Mahenye Ward	RS	AS	B	2014	332	519	Dunham & van der Westhuizen, 2015	3	221	31.9°E	21.5°S
Malapati Safari Area	RS	AS	B	2014	0		Dunham & van der Westhuizen, 2015	3	177	31.9°E	21.5°S
Malilangwe Conservancy	RS	AT	A	2013	272		Clegg, 2013	3	425	31.9°E	21.1°S
Matibi II Communal Lands	-	AS	E	1996	0		Davies et al., 1996	3	400	31.7°E	21.5°S
Nuanetsi Ranch	NP	O	D	2014	54		Dunham, 2015	2		30.8°E	21.6°S
Save Valley Conservancy	RS	AS	B	2014	1,585	1,295	Dunham & van der Westhuizen, 2015	2	3,496	32.1°E	20.4°S
Sengwe Communal Land	DT	AS	B	2013	35	99	Dunham et al., 2013	2	2,488	31.8°E	21.6°S

*RANGE OF INFORMED GUESS

KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— : No Change

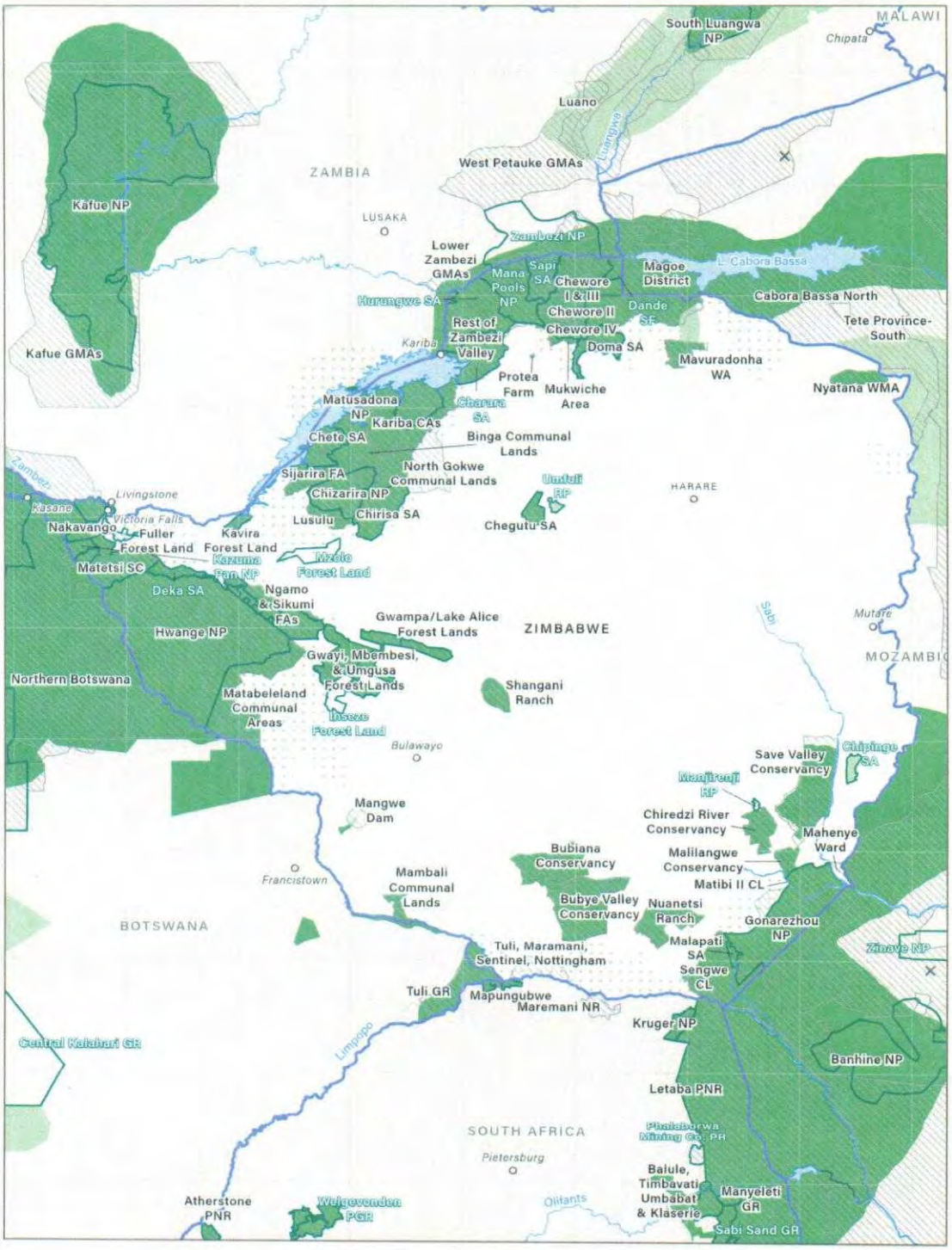
KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Zimbabwe



0 50 100 150 200 250 300km

ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

AfESG
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From: King, Jenna D
To: cf@conservationforce.org
Cc: Brisendine, Amy
Subject: FWS Permit Application no. 99564C
Date: Friday, August 14, 2020 12:47:54 PM

Hello,

This email is in regard to the FWS permit application #99564C for Samuel Noble to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 6/22/2018 and 7/11/2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: Aimee Korver
To: King, Jenna D
Subject: [EXTERNAL] Re: Fwd: FWS Permit Application no. 99564C
Date: Friday, August 14, 2020 4:48:49 PM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. King,

The date the trophy was taken was June 21,2018 in the save Valley on Sango ranch. He was hunting with Zambezi Hunters and believes they are no longer operating. His professional hunter was Thierry Labat.

Let us know if you need any other information.

Thank you,

AiméeKorver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

> -------- Forwarded Message --------
> Subject: FWS Permit Application no. 99564C
> Date: Fri, 14 Aug 2020 16:47:53 +0000
> From: King, Jenna D <jenna_king@fws.gov>
> To: cf@conservationforce.org <cf@conservationforce.org>
> CC: Brisendine, Amy <amy_brisendine@fws.gov>
>
>
>
> Hello,
>
> This email is in regard to the FWS permit application #99564C for Samuel
> Noble to import a lion trophy from Zimbabwe. On the application, it was
> indicated that the hunt was to take place between 6/22/2018 and
> 7/11/2018. Please provide the specific date that the lion was taken.
>
> Please reply directly to this email with the requested information.
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> Thank you and let me know if you have any questions.
>

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> received by this office*within 45 calendar days of the date of this
> email*, your application will be abandoned and administratively closed.
> Once a file is closed, you will need to submit a new application, and
> all required fees, for the Service to consider your proposed activity. /
>
>
> Thank you,
>
> Jenna King
> U.S. Fish and Wildlife Service
> International Affairs, Division of Management Authority
> Branch of Permits
> 5275 Leesburg Pike,MS: IA; 2W059D
> Falls Church, Virginia 22041
> https://www.fws.gov/international/permits/
> https://www.cites.or <https://www.cites.org/eng/disc/how.php>g
>

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.18 13:11:07 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING Digitally signed by JENNA KING Date: 2020.08.18 12:28:16 -04'00'

To: Permit File PRT- 99564C

Enhancement Finding

Applicant: Samuel Edward Noble, Jr. (PRT–99564C)

Introduction

Samuel Edward Noble, Jr. submitted an application on July, 03, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken in June 21, 2018, from the Savé Valley Conservancy (SVC), Sango Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Samuel Edward Noble, Jr. hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Noble's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Noble himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Savé Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Noble's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Noble supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Noble, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Noble in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Noble's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Noble's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Noble's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Noble, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Noble's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Noble submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Noble plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Noble's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Noble's permit request, we find that the expertise, facilities, or other resources available to Mr. Noble appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Noble's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Noble's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Noble on June 21, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Samuel Edward Noble, Jr. of Scottsboro, Alabama.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 18, 2020

Telephone Number: (b) (6)

JENNA KING Digitally signed by JENNA KING Date: 2020.08.18 12:36:35 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 99564C, Samuel Edward Noble, Jr., has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requested U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.18 13:09:03 -04'00'

Signature: _____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA99564C-0
Effective: 08/18/2020 Expires: 08/17/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.19 09:07:26 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

SAMUEL EDWARD NOBLE JR.
(b) (6)
SCOTTSBORO, AL 35769
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Expires 08/31/2020

RCVD MAR 28 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
NIMMONS	THOMAS	ANDERSON	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LEXINGTON	GA.	30648	USA	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) [redacted] 03/08/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

THOMAS NIMMONS
SAME AS PG. 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

THOMAS A. NIMMONS
(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTHERA LEO

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   REPUBLIC OF SOUTH AFRICA - TOWN - WINBURG, RANCH SMALDEEL PROVINCE FREE STATE

   b. Date wildlife is to be hunted:
   +- SEPTEMBER 2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   HUNTING OUTFITTER GABRIAL G VAN SCHALKWYK (KALAHARI PRIDE SAFARIS)

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   N/A

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). HAVEN'T HUNTED YET

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name: JOE REGAL
Business Name: JOE REGAL TAXIDERMY
Address: FARM Thelma PO BOX 339
City: ODENDAALSRUS
State/Province: R.S.A.
Country, Postal Code: 9460

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

YES SEE ADDITIONAL SHEETS

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

YES SEE ADDITIONAL SHEETS
LICENSE FEES/PERMITS S.A.GOVT./TROPHY FEES

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

YES SEE ADDITIONAL SHEETS

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by *me* and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) Date: 03/08/2019

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

THE ROLE OF SAPA IN THE RANCH LION INDUSTRY

- Ensure legal and ethical conduct of SAPA members through:
  - SAPA Code of Conduct;
  - SAPA Norms & Standards for breeding, keeping and hunting;
  - Accreditation of lion facilities for breeding, keeping and hunting;
  - Involvement of independent professionals in evaluating compliance and facilities;
  - Identification and traceability of lions belonging to SAPA members;
- Liaise and co-operate with organizations within the wildlife ranching and hunting industry;
- Liaise and co-operate with relevant local and international legislative authorities;
- Promote internationally accepted and approved standards and conduct;
- Active involvement in conservation of lions in the wild;
- Promote conservation through sustainable utilization;
- Active involvement in local rural community upliftment, education and communal projects;
- Offer specific wildlife related training opportunities for employees within the industry;
- Actively work toward correcting incorrect perceptions about the wildlife and hunting industries;
- Conduct business with openness, integrity and transparency;
- Act decisively against any member whose conduct is not aligned to the standards upheld by SAPA; and
- Protect and ensure the survival of the *Panthera leo* specie.

SAPA

SOUTH AFRICAN PREDATOR ASSOCIATION

Contact
P.O. Box 2618
VRYBURG
8600
SOUTH AFRICA

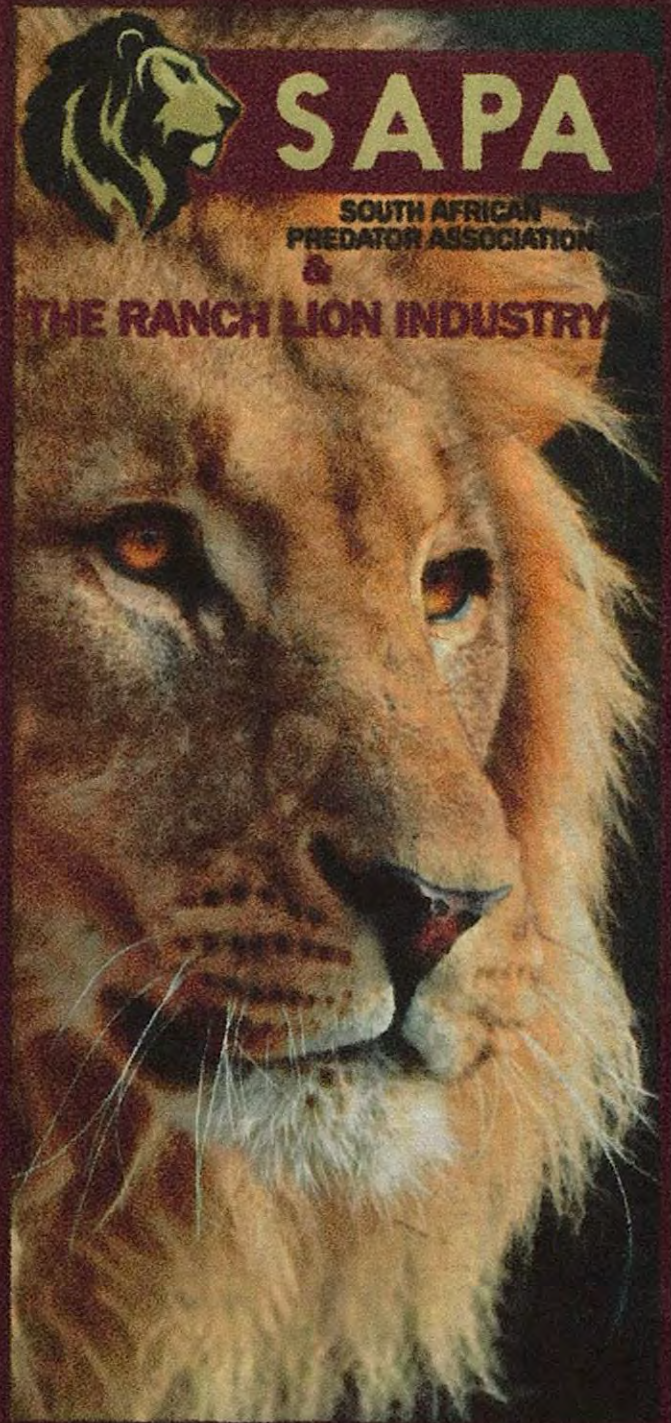
Tel: +27 (0)53 050 0192 / +27 (0) 83 616 8104
E-mail: sapaoffice@sapredators.co.za
Website: www.sapredators.co.za
Our office is located on the farm Brandwagt,
Vryburg, SOUTH AFRICA

SAPA

SOUTH AFRICAN PREDATOR ASSOCIATION

&

THE RANCH LION INDUSTRY



SAPA FACTS WITHIN THE RANCH LION INDUSTRY IN SOUTH AFRICA

95 SAPA RANCHES

LEGAL & LEGITIMATE

SAPA LION POPULATION OF ±5 000

STRICTLY REGULATED

MEMBERS OWN ±495 000 ACRES OF LAND

SAPA ACCREDITATION OF RANCHES

MEMBERS SUSTAIN ±1 000 JOBS

INCREASES AVAILABLE HABITAT

SUPPORT RELATED INDUSTRIES

SURVIVAL & CONSERVATION OF SPECIES

THE ANNUAL ECONOMIC CONTRIBUTION OF THE SOUTH AFRICAN LION INDUSTRY IS R493 614 000

OFFICIAL PERMIT

113 ST ANDREW STREET
ST ANDREW BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26

destea
department of economic, small business development, tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	87424 5101 083		
NAME	C G Botha		
PHYSICAL ADDRESS	Farm Smaldeel Theunissen 9410	POSTAL ADDRESS	P O Box 2 Winburg 9410
MOBILE NUMBER:	082-565-5527		
EMAIL ADDRESS	glenda@kukama.co.za		

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969). AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO;

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species	Scientific name	Total
Lion 4A5F006247, 4C063B5854, 4C2B27422E, 4948432402, 4724090C4A	Panthera Leo	5
Lion 4C476F202A, 945000001369182, 945000000873989, 900115000506701	Panthera Leo	4
Lion 900115000506702, 7110350264, 7110350A01, 945000001611647,7110350D6E	Panthera Leo	5
Lion 900085000036506, 900115000502781, 900115000506703, 900115000506704	Panthera Leo	4
Lion 900115000502782, 945000001615308, 900115000502783, 900115000502784	Panthera Leo	4
Lion 900115000502785, 900115000502814, 900115000502815, 900115000502816	Panthera Leo	4
Lion 900115000502817, 900115000502786, 900115000502819, 900115000502820	Panthera Leo	4
Lion 900115000506705, 900115000506706, 900115000502843, 900115000502844	Panthera Leo	4
Lion 900115000502845, 900115000502787, 900115000502788, 900115000502789	Panthera Leo	4
Lion 900115000502790, 900115000502791, 900115000502792, 900115000502793	Panthera Leo	4
Lion 900115000502794, 900115000502795, 900115000502796, 900115000502797	Panthera Leo	4
Lion 900115000502798, 900115000502799, 900115000502800, 900115000502801	Panthera Leo	4
Lion 900115000502802, 900115000502803, 900115000502804, 900115000502805	Panthera Leo	4
Lion 945000001869571, 945000001869572, 945000001869573, 945000001869574	Panthera Leo	4
Lion 945000001869575, 945000001869576, 945000001869577, 945000001869578	Panthera Leo	4
Lion 945000001869579, 945000001869580, 900115000506707, 900115000506708	Panthera Leo	4
Lion 900115000506709, 900115000506710, 900115000506711, 900115000506712	Panthera Leo	4
Lion 900115000506713, 900115000506714, 900115000506715, 900115000506716	Panthera Leo	4
Lion 900115000506717, 900115000506718, 900115000506719, 900115000506720	Panthera Leo	4
Lion 900115000506881, 900115000506882, 900115000506883, 900115000506884	Panthera Leo	4

The permit holder is authorised to possess the specified animal/s above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE	APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS	
pp [signature]	pp [signature]	
EXPIRY DATE 30 May 2019 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER LP.0354/2018	DATE ISSUED 2018/06/06

Department of Economic & Small Business Development Tourism & Environmental Affairs
08 JUN 2018
Private bag X 20801
Bloemfontein 9300
Free State Province

OFFICIAL PERMIT

113 ST ANDREW STREET
ST ANDREW BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20601
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 409 9327/26

destea
department of
economic, small business development,
tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	8742451010 83		
NAME	C G Botha		
PHYSICAL ADDRESS	Farm Smaldeel Theunissen 9410	POSTAL ADDRESS	P O Box 2 Winburg 9410
MOBILE NUMBER:	082-565-5527		
EMAIL ADDRESS	glenda@kukama.co.za		

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969)
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO;

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species	Scientific name	Total
Lion 900115000506885, 900115000506886, 900115000506887, 900115000506888	Panthera Leo	4
Lion 900115000506889, 900115000506890, 900115000506891, 900115000506892	Panthera Leo	4
Lion 900115000506893, 900115000506894, 900115000506895, 900115000506896	Panthera Leo	4
Lion 900115000506897	Panthera Leo	1
Tiger 900115000506898, 900115000506899 , 900115000506900	Panthera tigris	3

The permit holder is authorised to possess the specified animal/s above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE	APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS:	
EXPIRY DATE 30 May 2019 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER LP.0354/2018	DATE ISSUED 2018/06/12

Department of Economic & Small Business
Development Tourism & Environmental Affairs
08 JUN 2018
Private bag X 20601
Bloemfontein 9300
Free State Province

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] PRT identification number: MA35100D

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Tue, Jul 2, 2019 at 11:56 AM
To: Andy Nimmons (b) (6) >
Bcc: emma_nelson@fws.gov

Your application, 35100D, that was received on 3/28/19, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Thank you,
U.S. Management Authority, Branch of Permits.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Mon, Jul 1, 2019 at 10:53 PM Andy Nimmons (b) (6) > wrote:

> Hello ,
> I sincerely hope all is well. If you have time available could someone please advise the status of the pending application. I know you have alot of requests and I sincerely appreciate your effort. Regards and looking forward to your reply
>
> Thomas Nimmons
>
> *Sent from my Verizon Motorola Smartphone*

RCVD DEC 20 2017

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Milner	Seixas	Groves	III

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Watkinsville	GA	30677	Oconee	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Lawrenceville	GA	30043	Gwinnett	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? MA04168C-1
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best o[illegible] herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signa(b) (6) photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 12/15/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Genus & Species: Panthera Leo

   b. Sex (if known).
   Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:
   July 7, 2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
   Skin skull and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
   Zimbabwe, Bubye Valley Conservancy, 007 209

   b. Date wildlife was hunted:
   July 17, 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
LD Forwarding Co LTD
P O Box GD 467
Greendale, Harare

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Lynn Duncan
Business Name:	LD Forwarding Co LTD
Address:	P O Box GD 467
Address:	
City:	Greendale
State/Province:	Harare
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 12/15/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
(b) (6) [redacted] Lawrenceville, GA 30043

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Chad Milner
(b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/69772C

Enhancement Finding
Applicant: Seixas Groves Milner, III (PRT – 69772C)

Seixas Groves Milner, III submitted an application on December 20, 2017, for the importation of one male lion (*Panthera leo melanochaita*) taken from Bubye Valley Conservancy, Zimbabwe, for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken July 17, 2016, from this population meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt

any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P.l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinient to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P.l. melanochaita* taken in Zinmbabwe.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)] , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provides a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Milner's application involving a *P. l. melanochaita* sport-hunted trophy taken in Zimbabwe, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Milner's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zimbabwe's management program for lions addresses the three main threats

that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32 (a)(2), we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter, in this case Mr. Milner's participation in the hunting program contributes to the overall management of lions within a country.

The management program in Zimbabwe for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in Du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and

migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach et al. 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward et al. 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the

majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (p.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "…lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be

reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in Du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is legally permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by

rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five year terms, and how these concessionaires pay a 5 year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting

guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015). As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 – 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters account for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport-hunters conduct lion hunts in these areas; if so, the Service is not aware if sport-hunters are exempted by the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at the RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the

capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine that this impact of a sport-hunted lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport hunting market in BVC and SVC from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to locals, which incentivizes them to conserve the African lion. As mentioned in the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. Du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted; ZPWMA (2016) reports the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of the SVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (Du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. U.S. hunter participation in lion hunts, in and of itself, is not enough to make or break the industry. However, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term impact.

Further, the *Strategy and Action Plan* have put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

Therefore, based on the information available to the Service and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge et al. 2007, Whitman et al. 2004).

Throughout the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based setting for hunting quotas. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector. Further, Zimbabwe appears to be transparent in their management processes, including their quota setting.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (Du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both the BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (Du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable

population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continues to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion will likely reduced the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of this trophy, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the status of lions within Zimbabwe at the time Mr. Milner conducted his hunt, and the level of management and oversight provided to lions at that time, the Service is able to find that the harvest and import of Mr. Milner's sport-hunted trophy taken in Zimbabwe on July 17, 2016, meets the purposes of the Act. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe. Although the Service is able to make a finding that the import of this lion meets the enhancement criteria under the Act, the Service will continue to monitor the status and management of the lion in Zimbabwe. Noting that Zimbabwe's last management plan for lion was in 2006, the Service would like to see a current and updated plan that has been established as the national plan and disseminated across the country. The *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (2016), mentions a Management Plan for Hwange National Park; a copy of that and any other developed management plans will be considered in the future. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will

need to be continually updated on further progress of the outputs or targets. Lastly, the Service will also need to review any updates to the quota setting process.

Therefore, with the information available to the Service at the time Mr. Milner conducted his hunt, and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male lion trophy taken in Zimbabwe, to Mr. Seixas Groves Milner, III of Watkinsville, Georgia.**

6/20/18

Anna Barry, Acting Team Leader
Branch of Permits
Division of Management Authority

6/8/2018

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

References

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2015a. Panthera leo. The IUCN Red List of Threatened Species: e.T15951A50658092.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L.T.B., Macdonald, D.W., and Packer, C. 2015b. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. PNAS doi: 10.1073/pnas.1500664112

Bijlsma, R., and Loeschcke, V. (2012), Genetic erosion impedes adaptive responses to stressful environments. Evolutionary Applications, 5: 117–129. doi:10.1111/j.1752-4571.2011.00214.xCAMPFIRE (2015). An Overview.

Björklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023/A:1024737317695

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-04.pdf

Craigie, I.D., Baillie, J.E.M., Balmford, A., Carbone, C., Collen, B., Green, R.E., and Hutton, J.M. 2010. Large mammal population declines in Africa's protected areas. Biological Conservation 143(9):2221–2228.

Creel, S., M'soka, J., Dröge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, O., and R. Mandisodza-Chikerema (2016). Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

EcoWeb (2015). Campfire Hunting Income and Distribution.

Elliot, N. B., Valeix, M., Macdonald, D. W. and Loveridge, A. J. (2014), Social relationships affect dispersal timing revealing a delayed infanticide in African lions. Oikos, 123: 1049–1056. doi:10.1111/oik.01266.

Fryxell, J.M., Mosser, A., Sinclair, A.R.E and Packer, C. 2007. Group formation stabilizes predator–prey dynamics. Nature 449, 1041-1043.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(1):219–229.

Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undermining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org/10.1371/journal.pone.0029332.

A. J. Loveridge, A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016). Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016). Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area – Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.com/environment/2016/jan/06/zimbabwe-plans-to-sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321–328. doi:10.1890/070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, B., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salerno, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.1111/ele.12091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142–153. doi:10.1111/j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. 2006. Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991). Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219–230. doi:10.1111/j.1523-1739.1991.tb00127.x

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, O., Hardy, O., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications of landscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion (*Panthera leo*) social organization in a human affected landscape. 2010.

Traill, L., Brook, B., Frankham, R., Bradshaw, C. (2010). Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 2010, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non-Detriment Findings for Panthera leo in Zimbabwe.

LION ZIMBABWE ESA TROPHY

Permit Number: MA69772C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Gylliam

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

SEIXAS GROVES MILNER III
(b) (6) [redacted]
WATKINSVILLE, GA 30677
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the **2016** season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD DEC 20 2017 LP

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Link	Kenia	Adaline	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Wascott	WI	54890	Douglas	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b)(6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Minong	WI	54859	Washburn	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No ☒

3. Certifica[illegible] familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicab[illegible]***le 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of m[illegible]ny false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signatu[illegible]le for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 12/14/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      Area between Selous and Lunda Tanzania

   b. Date wildlife was hunted: July 18th 2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Full Skin / Hide, SKULL, CLAWS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Selous Game Reserve, Dar es Salaam, Tanzania

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Ahmed Huwel
Business Name: MKWAWA
Address: Selous Game Reserve
Address:
City: Dar es Salaam
State/Province: Tanzania
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.
Please see information provided by Conservation Force, Tanzanian authorities, and safari operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if ap[redacted]derstand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 12/14/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Link's Wild Safaris
(b) (6) [redacted]
Minong, WI 54859

ATTN: Tommy + Air Bill enclosed
(b)(6) [redacted]

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Kenia A. Link

Date: 12/14/2017

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import applications / request for information

2 messages

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:08 PM
To: jjj@conservationforce.org, cf@conservationforce.org
Cc: Mary Cogliano <mary_cogliano@fws.gov>

Mr. Jackson,

We are in the process of reviewing applications for the import of African lions taken from Tanzania. A number of applicants have named you as the representative for all matters concerning the application. I have attached a list of the applications currently pending for which you have been named as the representative.

As you are aware, the U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. As you know, we are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings. As such, we would like to give you the opportunity to submit additional information in support of these application requests. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

TZlionApplications-RepJJackson.xlsx
16K

Butzler, Julia <julia_butzler@fws.gov> Wed, Jul 25, 2018 at 10:22 AM
To: jjj@conservationforce.org, cf@conservationforce.org, jjw-no2@att.net

Mr. Jackson,

Please use the updated spreadsheet for reference of the applications that name you as their representative.

Thank you,
[Quoted text hidden]

TZlionApplications-RepJJackson.xlsx
17K

Permit number	Applicant business name	Date permit request	Last name	First name	Address 1	City	ST	Zip/ postal code	Country	Telephone	Email
84925C	TURNER, DAVID WAYNE	3/27/2018	TURNER	DAVID	(b) (6)	MIDDLETON	ID	83644	US	(b) (6)	
82925C	WRIGHT, JOHN STEPHEN	3/15/2018	WRIGHT	JOHN		AMARILLO	TX	79109	US		
69716C	LINK, KENIA ADALINE	12/20/2017	LINK	KENIA		WASCOTT	WI	54890	US		
45770C	FOWLER, THEODORE MEREDITH	8/1/2017	FOWLER	THEODORE		RALEIGH	NC	27614	US		
40253C	ZILLMER, JOHN JACOB	6/8/2017	ZILLMER	JOHN		GLENMOORE	PA	19343	US		
36878C	ENGEL, VICTOR A	5/23/2017	ENGEL	VICTOR		CONCORD	NH	03303	US		
25070C	MARKL, EDWARD MARTIN	3/7/2017	MARKL	EDWARD		DECATUR	TX	76234	US		
25074C	CROUCH, JACK D.	3/7/2017	CROUCH	JACK		MCLEAN	VA	22101	US		
17490C	CUSICK, TODD DENNIS	1/13/2017	CUSICK	TODD		PROVO	UT	84604	US		
12625C	CARMICAL, JEFF	11/17/2016	CARMICAL	JEFF		MONTICELLO	AR	71655	US		
12548C	ATKINSON, CARL R.	11/9/2016	ATKINSON	CARL		ORLANDO	FL	32804	US		
11956C	HOWARD, THOMAS M.	11/7/2016	HOWARD	THOMAS		COLUMBUS	MS	39705	US		
08543C	CROUSEN, GUINN DALE	9/28/2016	CROUSEN	GUINN		DALLAS	TX	75205	US		
08545C	NOSLER, JOHN ROBERT	9/28/2016	NOSLER	JOHN		BEND	OR	97701	US		
08549C	FALKOWSKI, JAMES WILLIAM	9/28/2016	FALKOWSKI	JAMES		COOPER CITY	FL	33026	US		
02148C	HOWARD, THOMAS MALCOLM	7/19/2016	HOWARD	THOMAS		COLUMBUS	MS	39705	US		
92186B	WRIGHT, JOHN STEPHEN	3/21/2016	WRIGHT	JOHN		AMARILLO	TX	79109	US		

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Import Permit Applications #69716C and #46748D

1 message

Harcum, Heather <heather_harcum@fws.gov> Mon, Sep 9, 2019 at 9:51 AM
To: jjj@conservationforce.org

Good morning John Jackson,

I am reaching out in regards to two applications to import an African lion trophy (*Panthera leo melanochaita*) with Mkwawa Hunting Safaris Ltd. from the Selous Game Reserve in Tanzania to the United States; these lions have already been taken.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the import. Could you please provide to the following:

PRT # 69716C; Kenia Adaline Link (application received 12/20/2017)

1. Hunting block on which was the lion taken.

2. Name of the professional hunter worked with.

3. An operator report, or its equivalent, for Mkwawa Hunting Safaris, Ltd.

PRT # 46748D; Laurie G. Tipps (application received 07/03/2019)

1. Hunting block on which the lion was taken

2. An operator report, or its equivalent, for Mkwawa Hunting Safaris, Ltd.

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
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SHANE MAHONEY
RENEE SNIDER

October 11, 2019

TRANSMISSION VIA EMAIL: heather_harcum@fws.gov
Department of the Interior
Ms. Heather Harcum, Biologist
Government Information Specialist
Division of Management Authority
Branch of Permits; MS: IA
US Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3805

RE: APPLICATION TO IMPORT SPORT-HUNTED TROPHY
PRT NO.: 69716C
APPLICANT NAME: Kenia Adaline Link

Dear Ms. Harcum:

In response to your email dated October 2, 2019, please be advised that the Elephant trophy is being held and imported from a different location. The Elephant trophy is in Toronto, Canada, at Applicant's Taxidermist.

Below please find the information regarding the harvest:

SPECIE:	Loxodonta Africana [African Elephant]
DATE OF HARVEST:	July 18, 2017
COUNTRY:	Tanzania

Applicant has been advised to contact her Taxidermist to file the proper permit and CITES.

Kind Regards,

/s/ Emma C. Sampson
Permits Department

JJJ/ecs

cc: File
Applicant: Kenia A. Link, *via email:* (b) (6) [redacted]

Harcum, Heather <heather_harcum@fws.gov>

[EXTERNAL] PRT 69716C - UPDATE TANZANIA - ELEPHANT

6 messages

Emma C. Sampson <permits@conservationforce.org> Fri, Oct 11, 2019 at 3:16 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>

Dear Ms. Harcum,

Please see attached letter.

Kind regards,

Emma

> On October 2, 2019 at 12:37 PM "Harcum, Heather" <heather_harcum@fws.gov> wrote:
>
> Good afternoon Emma,
>
> I wanted to see if you had any updates on the following permit applications that had Conservation Force as their contact. I attached an Excel spreadsheet that indicates whether the hunt (and their physical address) have been confirmed, and whether we have received a report from the operator. Feel free to reach out if you have any questions or concerns.
>
> Thank you,
> Heather Harcum
>
> --
>
> **Heather Harcum** | Permits Biologist
> USFWS | International Affairs
> 5275 Leesburg Pike, MS: IA
> Falls Church, Virginia, 22041-3803, USA
> Phone 703-358-2350 | Fax 703-358-2115
>
> www.CITES.org

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

2019.10.10 Ltr Suppl info - Harcum FWS 2019.10.11.pdf
166K

Harcum, Heather <heather_harcum@fws.gov> Tue, Oct 15, 2019 at 12:05 PM
To: "Emma C. Sampson" <permits@conservationforce.org>

Hi Emma,

I just wanted to inform you that I will get all of the information requested here, as well as the information requested on the phone today to you once our system is back up and running.

Thank you!
Heather
[Quoted text hidden]

Emma C. Sampson <permits@conservationforce.org> Tue, Oct 15, 2019 at 12:17 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>

Thanks!

Emma
[Quoted text hidden]

Harcum, Heather <heather_harcum@fws.gov> Tue, Oct 22, 2019 at 3:25 PM
To: "Emma C. Sampson" <permits@conservationforce.org>

Hi Emma,

Just got a chance to look at this. PRT #69716C is in reference to a sport-hunted *lion* for import, not an elephant. Were you referring to a separate application?

Thank you,
Heather Harcum
[Quoted text hidden]

Emma C. Sampson <permits@conservationforce.org> Wed, Oct 23, 2019 at 12:38 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>

Hi Heather,
It is for a Lion not an Elephant for Kenia Link. I was confused. Another family member, Troy Link, has appl. for Elephant in Zimbabwe.

Thanks for asking.
Have a good day!
Emma
[Quoted text hidden]

Harcum, Heather <heather_harcum@fws.gov> Thu, Oct 24, 2019 at 9:42 AM
To: "Emma C. Sampson" <permits@conservationforce.org>

Thank you Emma,

I will add this to Kenia's files. I'm not sure what you mean by the taxidermist applying for an import permit into the U.S. since she already filed a permit with us through Conservation Force.
Is she wanting to withdraw her original application? Instead she and the taxidermist may just add additional information to the current application to allow us to make an enhancement finding for the hunt in Tanzania, and if we intend to issue, then do so as an import from Canada.

If we keep this same application, we will additionally require the CITES export permit from Tanzania and the CITES import documentation into Canada.

Thanks again,
Heather Harcum
[Quoted text hidden]

Harcum, Heather <heather_harcum@fws.gov>

[EXTERNAL] LINK, K - PRT 69716C - UPDATE TANZANIA - SPORT-HUNTED TROPHY - LION TANZ

Emma C. Sampson <permits@conservationforce.org> Thu, Oct 31, 2019 at 5:26 PM
To: (b) (6)

RE: APPLICATION TO IMPORT SPORT-HUNTED TROPHY
PRT NO.: 69716C
APPLICANT NAME: Kenia Adaline Link
SPECIE: Panthera Melanochaita, Leo [African Lion]
DATE HARVESTED: July 18, 2017
COUNTRY: Tanzania

Dear Ms. Harcum:

In response to your email dated October 29, 2019, requesting the Import Permit from Tanzania to Canada, attached please find supporting documents about the Import Permit for the above captioned Applicant: a. CITES Permit no.: 3100, valid until 01/13/2019, b. Tanzania Permit; c. Health Certificate for treated game trophy; d. invoice from Peninsula Custom Brokers Ltd. in Ontario, Canada; e. Receipt from the Department of National Revenue – Customs and Excise; f. Air Bill; g. Master Air Waybill Acceptance Statement, h. invoice from Go Wild Hunting Safaris Ltd, Tanzania; i. invoice from Blue Logistics Company Limited; j. invoice for duty.

Kind Regards,

/s/ Emma C. Sampson
Permits Department

cc: File
Applicant: Kenia A. Link, via (b) (6)
Enclosures:

a. CITES Permit no.: 3100
b. Tanzania Permit
c. Health Certificate for treated game trophy
d. Invoice from Peninsula Custom Brokers Ltd. in Ontario, Canada
e. Receipt from the Department of National Revenue – Customs and Excise

f. Air Bill
g. Master Air Waybill Acceptance Statement
h. invoice from Go Wild Hunting Safaris Ltd, Tanzania
I. invoice from Blue Logistics Company Limited;
j. invoice for duty

If you have any additional question, please do not hesitate to contact us.

Kind regards,

Emma

> On October 29, 2019 at 11:49 AM "Emma C. Sampson" <permits@conservationforce.org> wrote:
>
> Mr. J.,
>
> Please revise and ok - text below. Thanks, E
>
> Dear Ms. Link,
>
> FWS needs the Import Permit from Tanzania to Canada for your Elephant trophy. Would you be so kind to send it to us via email, please.
>
> Kind regards,
>
> Emma
>
> ---------- Original Message ----------
> From: "Harcum, Heather" <heather_harcum@fws.gov>
> To: "Emma C. Sampson" <permits@conservationforce.org>
> Date: October 29, 2019 at 7:35 AM
> Subject: Re: [EXTERNAL] LINK, K - PRT 69716C - UPDATE TANZANIA - SPORT-HUNTED TROPHY - ELEPHANT
>
> Thank you Emma,
>
> Could you please provide the import permit from Tanzania to Canada?
>
> Respectfully,
> Heather Harcum
>
> On Mon, Oct 28, 2019 at 5:52 PM Emma C. Sampson < permits@conservationforce.org> wrote:
>
> Dear Ms. Harcum:

RE: APPLICATION TO IMPORT SPORT-HUNTED TROPHY
PRT NO.: 69716C
APPLICANT NAME: Kenia A. Link
SPECIE: African Elephant
DATE HARVESTED: July 18, 2017
COUNTRY: Tanzania

1. Ms. Kenia link does not want to withdraw her application.
2. Yes, Ms. Link was advised to get a re-export permit from Canada when she exports it to the U.S.A.

Kind Regards,

Emma

> On October 24, 2019 at 8:42 AM "Harcum, Heather" < heather_harcum@fws.gov> wrote:
>
> Thank you Emma,
>
> I will add this to Kenia's files. I'm not sure what you mean by the taxidermist applying for an import permit into the U.S. since she already filed a permit with us through Conservation Force.
> Is she wanting to withdraw her original application? Instead she and the taxidermist may just add additional information to the current application to allow us to make an enhancement finding for the hunt in Tanzania, and if we intend to issue, then do so as an import from Canada.
>
> If we keep this same application, we will additionally require the CITES export permit from Tanzania and the CITES import documentation into Canada.
>
> Thanks again,
> Heather Harcum
>
> On Wed, Oct 23, 2019 at 12:39 PM Emma C. Sampson < permits@conservationforce.org> wrote:
>
> > Hi Heather,
> > It is for a Lion not an Elephant for Kenia Link. I was confused. Another family member, Troy Link, has appl. for Elephant in Zimbabwe.
> >
> > Thanks for asking.
> > Have a good day!
> > Emma
> >
> > On October 22, 2019 at 2:25 PM "Harcum, Heather" < heather_harcum@fws.gov> wrote:
> >
> > Hi Emma,
> >
> > Just got a chance to look at this. PRT #69716C is in reference to a sport-hunted *lion* for import, not an elephant. Were you referring to a separate application?
> >
> > Thank you,
> > Heather Harcum
> >
> > On Tue, Oct 15, 2019 at 12:18 PM Emma C. Sampson < permits@conservationforce.org> wrote:
> >
> > > Thanks!
> > >
> > > Emma
> > >
> > > On October 15, 2019 at 11:05 AM "Harcum, Heather" < heather_harcum@fws.gov> wrote:
> > >
> > > Hi Emma,
> > >
> > > I just wanted to inform you that I will get all of the information requested here, as well as the information requested on the phone today to you once our system is back up and running.
> > >
> > > Thank you!
> > > Heather
> > >
> > > On Fri, Oct 11, 2019 at 3:17 PM Emma C. Sampson < permits@conservationforce.org> wrote:
> > >
> > > > Dear Ms. Harcum,
> > > >
> > > > Please see attached letter.
> > > >
> > > > Kind regards,
> > > >
> > > > Emma
> > > >
> > > > On October 2, 2019 at 12:37 PM "Harcum, Heather" < heather_harcum@fws.gov>

wrote:

Good afternoon Emma,

I wanted to see if you had any updates on the following permit applications that had Conservation Force as their contact. I attached an Excel spreadsheet that indicates whether the hunt (and their physical address) have been confirmed, and whether we have received a report from the operator. Feel free to reach out if you have any questions or concerns.

Thank you,
Heather Harcum

--

Heather Harcum |
Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
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Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
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--

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www.CITES.org

Emma C. Sampson

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e. permits@conservationforce.org
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--

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Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Emma C. Sampson

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Emma C. Sampson

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Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

---

2 attachments

LINK, Kenia - Permits and invoices.pdf
1329K

2018.08.11 Taxidermy Services receipt - LION - Ontario, Canada.pdf
1085K

BLUE LOGISTICS COMPANY LIMITED

DEALERS IN: CLEARING & FORWADING, CARGO AGENCY.

DAR ES SALAAM BRANCH:
MWL. J.K. Nyerere International Airport
Swissport New Import Warehouse, Cargo Area, 1st Floor, Room No. 10
P.O. Box 18049, DSM - TANZANIA
Tel : +255 787 315939 / +255 718 861197
Email : info@bluelogistics.co.tz.
Web : www.bluelogistics.co.tz.

ARUSHA BRANCH:
Blue Logistics Co. Ltd.
N.S.S.F. Building, 4th Floor Kaloleni
P.O. Box 2199 ARUSHA - TANZANIA
Tel : +255 754 461049 / +255 715 461049
Email : msigwaenock@bluelogistics.co.tz.
Web : www.bluelogistics.co.tz.

INVOICE

0460

TIN No. : 103-830-168

M/s: KENIA ADALINE LINK

(b) (6)

WI 54849, USA

No. BLC/034

REF. No.

Date 11/09/2018

QTY	PARTICULARS	USD ~~SHS.~~	CTS.
01	Freight Charges DAR/TORONTO	1,530	00
	TOTAL	1,530	00

Remarks: Payment within ten day

Prepared by Account Rich

Approved by Manager Ismail

OUR PHYSICAL ADDRESS AND BANK ACCOUNT DETAILS

BLUE LOGISTICS COMPANY LTD.
MWL. J.K. Nyerere International Airport
Swissport New Import Warehouse, Cargo Area, 1st Floor, Room No. 10
P.O. Box 18049, Dar es Salaam, Tanzania
Tel: +255 787 315939 / +255 718 861197

BANK NAME : BARCLAYS BANK (TANZANIA)
LOCATION : OHIO STREET - DAR ES SALAAM
A/C No. : 0019001334
SWIFT CODE: BARCTZTZ

CAUTION : *Do not accept any changes on Bank Account details without contacting us for clarification*

THE UNITED REPUBLIC OF TANZANIA
MINISTRY OF LIVESTOCK AND FISHERIES

Telephone: 2866446/2864306
Fax 2862538
E-mail: zoosanitary@mifugo.go.tz

Directorate of Veterinary Services
P.O. Box 9152

Dar es Salaam.

PERMIT NUMBER.....Valid until.....
Export trophy certificates No ..... dated .....
CITES No 31100 dated 14/07/2018

Identification of game trophies:

S/NO	Type of game trophy	Qty (Pcs)	Remarks
1.	Lion skull	1 PC	
2.	Lion full skin	1 PC	
		2 PCS	

Signature.....
Name: **Dr.**
For: **Director of Veterinary Services**

ZOOSANITARY AT PORT OF EXIT

GO WILD HUNTING SAFARIS LTD

Head Office, P.O. Box 678 Morogoro, Tanzania

INVOICE NO. GHS 015/2018

TO. KENIA ADELINE LINK
(b) (6)
WI 54849
U.S.A

S/N	DESCRIPTION	QUANTITY	UNIT PRICE	VALUE $
1.	Lion skull	1 PC	80.00	80.00
2.	Lion full skin	1 PC	2000.00	2000.00
	TOTAL			USD 2,080.00

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

PERMIT / CERTIFICATE

№ 31100

Original

☑ EXPORT
☐ RE-EXPORT
☐ IMPORT
☐ OTHER :

2. Valid until: 13/01/2019

3. Importer (name and address)
KENIA ADALINE LINK
(b) (6) [redacted]
WI 54849

4. Exporter / Re-exporter (name and address, country)
GO WILD HUNTING SAFARIS LTD
P.O. BOX 40425
DAR ES SALAAM
TANZANIA

Signature of the applicant

3a. Country of import: USA

5. Special conditions

For live animals, this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations.

6. Name, address, national seal/stamp and country of Management Authority
The Director of Wildlife
Wildlife Division
Ministry of Natural Resources and Tourism
Mpingo House, 4th floor,
40 Julius Nyerere Road,
15 472 – DAR ES SALAAM
TANZANIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp N°: 1533275

	7./8. SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age/sex if live)	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported/ Quota
A	7./8. (PANTHERA LEO) LION	9. SKULL	10. IIw	11. ONE (01)	11a. —
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ★★ or date of acquisition ★★★
B	7./8. (PANTHERA LEO) LION	9. FULL SKIN	10. IIw	11. ONE (01)	11a. —
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ★★ or date of acquisition ★★★
C	7./8.	9.	10.	11.	11a.
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ★★ or date of acquisition ★★★
D	7./8.	9.	10.	11.	11a.
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ★★ or date of acquisition ★★★

★ Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
★★ Only for specimens of Appendix-I species bred in captivity or artificially propagated for commercial purposes
★★★ For pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY : Segoline Tarimo

1533275

DAR ES SALAAM — Place
14.07.2018 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT :

15. Bill of Lading/Air Way-bill Number :

Block	Quantity
A	
B	
C	
D	

Port of Export | Date | Signature | Official stamp and title

CITES PERMIT / CERTIFICATE № 3110

Peninsula Custom Brokers Limited

LICENSED CUSTOMS BROKER

Service Is Our Frame Of Mind

PLEASE REMIT TO ▶
PLEASE RETURN ONE COPY OF INVOICE WITH YOUR REMITTANCE

BOX 1042. FORT ERIE, ONTARIO L2A 5N8
TELEPHONE 905-871-5922
FAX 905-871-1444
www.peninsulacustoms.com

DATE 11/08/2018
Invoice: 04-0133529

ADVANCED TAXIDERMY & WILDLIFE DE
3630 KING STREET
CALEDON ON
L7C 0R5 Canada

BRANCH OFFICE:
LEWISTON-QUEENSTON BRIDGE
14154 NIAGARA PKWY, UNIT 21
NIAGARA-ON-THE-LAKE, ONTARIO L0S 1J0
TELEPHONE 905-262-5033
FAX 905-262-5577

Customer #: 152

ENTRY NUMBER	SERVICES RENDERED	CODE	AMOUNT
▸ 009637725	G.S.T. ON IMPORTATION		134.52
	BROKERAGE PEARSON INT'L AIRPRT	(T)	33.50
	RMD	(T)	15.00
	ADJ. & PAY CHARGES	(T)	5.00
	EDI PROCESSING FEE	(T)	3.00
	SPECIAL ATTENTION	(T)	25.00
	B. ZEE COURIER/CARTAGE# 2281		35.00

E-MAILED

GST/HST (T) ITEMS TOTALING :	81.50	10.60
INV. TOTAL EXCLUDING GST/HST:	116.50	
TOTAL GST/HST ON INVOICE :	145.12	

▸ EXPLANATION

GST #R104138060

NOTE: IF GST OVERPAID ON B3, PLEASE CLAIM INPUT TAX CREDIT, MFN RATE APPLIED IF FTA CERTIFICATE NOT PROVIDED.

TOTAL ▶ 261.62

DUTY AND TAXES ARE CASH - NO RESPONSIBILITY ASSUMED FOR DELAY IN CLEARANCE IF THIS ACCOUNT IS NOT PAID ON PRESENTATION

PAYABLE ON PRESENTATION

IMPORTANT: WRITTEN NOTIFICATION OF ERRORS, OMISSIONS, SHORTAGES, AND / OR DAMAGE MUST BE RECEIVED BY US WITHIN 30 DAYS OF RELEASE DATE.

GO WILD HUNTING SAFARIS LTD

Head Office, P.O. Box 678 Morogoro, Tanzania

INVOICE NO. GHS 015/2018

TO. KENIA ADELINE LINK
(b) (6)
WI 54849
U.S.A

S/N	DESCRIPTION	QUANTITY	UNIT PRICE	VALUE $
1.	Lion skull	1 PC	80.00	80.00
2.	Lion full skin	1 PC	2000.00	2000.00
	TOTAL			USD 2,080.00

B. Zee Brokerage Ltd.
MISSISSAUGA, ONTARIO
L5T 2L2
Phone: (905) 670 3033
Fax: (905) 670 4033
www.bzeebrokerage.com

IMPORTER	TRANSACTION NO.	TRANSACTION DATE	INVOICE NO.	INVOICE DATE
PENINSULA CUSTOM BROKERS		2018-10-04	01-506309 I	2018-10-04
BUSINESS NO.	WHSE. TYPE AB	P.O. NO.		

BILL TO ACCT # P1007
PENINSULA CUSTOM BROKERS
P.O. BOX 1042
FORT ERIE, ONT L2A 5N8

EXPORTER | PIECES
CARGO CONTROL NO. | WEIGHT
CARRIER | RELEASE PORT

ENTRY SUMMARY Ref #

Ref 2281
Advance a Tax
15544-009637725

ENTRY TOTALS VALUE FOR CURRENCY CONVERSION 0.00 VALUE FOR DUTY 0.00

INVOICE	G.S.T./H.S.T.	AMOUN
04 CUSTOMS RELEASE FEE	1.95	15.00
33 COURIER		35.00

DUE TO THE RECEIVER GENERAL	DUTY	EXCISE TAX	G.S.T.	TOTAL DUTY & TAXES	TOTAL G.S.T./H.S.T.	PREPAID AMOUNT
	0.00	0.00			1.95	

TOTAL DUE 51.95 CAD

PROTECT YOUR CREDIT - IT'S IMPORTANT - PAY

All business accepted and conducted by B. Zee Brokerage Ltd. are subject to our terms and conditions which can be found at http://bzeebrokerage.com/terms-conditions

DUTY ON THIS INVOICE IS PAYABLE ON

- Errors/ommissions must be brought to our attention within 30 days.
- Duty and taxes subject to final determination.
- Certified copies available upon request.
- 2% per month added on overdue accounts.

BUSINESS # 100710714RT0001

ORIGINAL INVOICE

Harcum, Heather <heather_harcum@fws.gov>

[EXTERNAL] Kenia A. Link - PRT NO.: 69716C - APPL IMPORT SPORT HUNTED TROPHY LION TANZ

1 message

Emma C. Sampson <permits@conservationforce.org> Fri, Dec 27, 2019 at 1:57 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>

Dear Ms. Harcum,

Please supplement application for import of sport-hunted trophy for:

APPLICANT NAME: Kenia Adaline Link
PRT NO.: 69716C
SPECIE: AFRICAN LION
DATE OF HARVEST: July 18, 2017
COUNTRY: Tanzania

Kind regards,

Emma

> On December 23, 2019 at 11:35 AM "Harcum, Heather" <heather_harcum@fws.gov> wrote:
>
> Good afternoon Emma,
>
> Following up on our previous phone conversation I am requesting the operator report for Mkwawa Hunting Safaris Ltd. that you said you had available. You are more than welcome to send this report via e-mail as we will place it in our files.
>
> Thank you,
> Heather Harcum
> --
>
> **Heather Harcum** | Permits Biologist
> USFWS | International Affairs
> 5275 Leesburg Pike, MS: IA
> Falls Church, Virginia, 22041-3803, USA
> Phone 703-358-2350 | Fax 703-358-2115
>
> www.CITES.org

Emma C. Sampson

Conservation Permitting Division
CONSERVATION FORCE
P.O. Box 278
Metairie, LA 70004-02781
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

MKWAWA Hunting Safaris.pdf
1081K

MKWAWA
HUNTING SAFARIS

CSR

At Mkwawa Hunting Safaris, we believe in supporting the communities around us. Many of our employees come from the local area and are able to gain valuable skill sets, which help reduce rural poverty.

Furthermore, we have engaged in a number of schemes designed to alleiviate chronic problems, namely lack of provision of health and education services.

We have donated to district health centres and have provided assistance on an individual level to employees and their families. Furthermore, in 2013 we commissioned a water well of over 100ft depth to serve Msolwa Primary School. Apart from the time taken from school to find water, students had previously had to deal with unsafe water and unstable seasonal supply. The well now provides clean and reliable water to over 400 students and teachers.

A percentage of all profits made at Mkwawa are redirected into community projects, for the good of the populace and the health of the reserve.

Mkwawa actively engages in anti-poaching practice, involving both active approaches such as patrolling and monitoring, and pre-emptive approaches such as education of community children and rehabilitation of

MKWAWA
HUNTING SAFARIS

Mkwawa (index.php?id=34) / CSR

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Contact Ahmed

Ahmed Huwel
Tel: +255-685-010101
Email: info@mkwawahuntingsafaris.com (mailto:info@mkwawahuntingsafaris.com)
URL: www.mkwawahuntingsafaris.com (http://www.mkwawahuntingsafaris.com)

Contact Pano

Pano Calavarias
Tel: +255-756 487318
panocalavrias@gmail.com (mailto:panocalavrias@gmail.com)

Quicklinks

Hunting Blocks (index.php?id=42)
Which Animals are available (index.php?id=43)
Terms & Conditions (index.php?id=44)
Our Team
(index.php?id=46)

MKWAWA HUNTING SAFARIS LTD

Selous Game Reserve
Tanzania

MKWAWA
HUNTING SAFARIS

CSR

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MKWAWA
HUNTING SAFARIS

Mkwawa (index.php?id=34) / CSR

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URL: www.mkwawahuntingsafaris.com (http://www.mkwawahuntingsafaris.com)

Contact Pano

Pano Calavarias
Tel: +255-756 487318
panocalavrias@gmail.com (mailto:panocalavrias@gmail.com)

Quicklinks

Hunting Blocks (index.php?id=42)
Which Animals are available (index.php?id=43)
Terms & Conditions (index.php?id=44)
Our Team
(index.php?id=46)

MKWAWA HUNTING SAFARIS LTD

Selous Game Reserve
Tanzania

ENDANGERED SPECIES OF
WILD FAUNA AND FLORA

☐ RE-EXPORT ☐ IMPORT ☐ OTHER :

Original

2. Valid until: 13/01/2019

3. Importer (name and address)
KENIA ADALINE LINK
(b) (6) [redacted]
WI 54849

4. Exporter / Re-exporter (name and address, country)
GO WILD HUNTING SAFARIS LTD
P.O. BOX 40425
DAR ES SALAAM
TANZANIA

Signature of the applicant

3a. Country of import: USA

5. Special conditions

For live animals, this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations.

6. Name, address, national seal/stamp and country of Management Authority
The Director of Wildlife
Wildlife Division
Ministry of Natural Resources
and Tourism
Mpingo House, 4th floor,
40 Julius Nyerere Road,
15 472 – DAR ES SALAAM
TANZANIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp N°: 1533275

	7./8. SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age/sex if live)	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported/ Quota
A	7./8. (PANTHERA LEO) LION	9. SKULL	10. IIw	11. ONE (01)	11a. —
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ★★ or date of acquisition ★★★	
B	7./8. (PANTHERA LEO) LION	9. FULL SKIN	10. IIw	11. ONE (01)	11a. —
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ★★ or date of acquisition ★★★	
C	7./8.	9.	10.	11.	11a.
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ★★ or date of acquisition ★★★	
D	7./8.	9.	10.	11.	11a.
	12. Country of origin ★ / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ★★ or date of acquisition ★★★	

★ Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
★★ Only for specimens of Appendix-I species bred in captivity or artificially propagated for commercial purposes
★★★ For pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY : Segoline Tarimo

1533275

DAR ES SALAAM — Place
14.07.2018 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT :

15. Bill of Lading/Air Way-bill Number : 235 C147 3706

Block	Quantity
A	— 1
B	— 1 —
C	
D	

JNIA-D/SM — Port of Export
25/09/2018 — Date
Signature
Official stamp and title

CITES PERMIT / CERTIFICATE N° 31100

[EXTERNAL] PRT No.: 69716C (Kenia Link - Tanzania - lion)

Tammy Piker <permits@conservationforce.org>

Thu 2/27/2020 10:59 AM

To: Harcum, Heather L <heather_harcum@fws.gov>
Cc: jjjiii@att.net <jjjiii@att.net>; shannon@linkswildsafaris.com <shannon@linkswildsafaris.com>; jaylink@linkswildsafaris.com <jaylink@linkswildsafaris.com>

2 attachments (622 KB)
Kenia Link 1.pdf; Kenia Link 2.pdf;

Good morning Heather. As per your email request of January 31, 2020, I am attaching Kenia Link's Game Hunting Permit. If there is anything else you need, let me know.

Tammy L. Piker

Conservation Permitting Division
CONSERVATION FORCE
P.O. Box 278
Metairie, LA 70004-0278
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

> On January 31, 2020 at 8:45 AM "Harcum, Heather L" <heather_harcum@fws.gov> wrote:
>
> Good morning Tammy,
>
> Could you addionally pr ovide Kenia's hunng license fr om her lion hunt in Tanzania?
>
> Thank you,
> Heather Harcum
>
> ---
>
> **From:** Harcum, Heather L <heather_harcum@fws.gov>
> **Sent:** Tuesday, January 28, 2020 2:46 PM
> **To:** Tammy Piker <permits@conserva onforce.org>
> **Subject:** Re: [EXTERNAL] Fwd: PRT No.: 69716C (Kenia Link - Tanzania - lion)
>
> Received. Thank you, Tammy!
>
> ---
>
> **From:** Tammy Piker <permits@conserva onforce.org>
> **Sent:** Tuesday, January 28, 2020 10:26 AM
> **To:** Harcum, Heather L <heather_harcum@fws.gov>
> **Subject:** [EXTERNAL] Fwd: PRT No.: 69716C (Kenia Link - Tanzania - lion)

Heather, A copy of the validated CITES export permit issued by Tanzania that you have been requesting is attached. I believe you now have all that you have requested. Forgive the delay but no one understood a request for proof of validation for an Appendix II personal hunting trophy between two other countries. If you need anything further, please contact the undersigned. Thank you for your patience.

Tammy L. Piker

Conservation Permitting Division
CONSERVATION FORCE
P.O. Box 278
Metairie, LA 70004-02781
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

14098

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

MAIN PERMIT

IN.# 3049432

APP: 2004865

RETURN DATE: Friday, August 11, 2017

GAME HUNTING PERMIT

PERMIT NO. 2004866

Station DAR ES SALAAM **Start Date** July 01, 2017 **End Date** July 21, 2017 **Package Type** 21 DAYS **Extra Days:** 0

This RESIDENT'S / VISITOR'S Permit is Granted to KENIA ADALINE LINK **of Address** **Passport No.** 544565508

Who holds Weapon (Type) RIFLE **Calibre** 416 & 338 **Maker's No:** S6222176& T6209090 **C.A.R No:** NA

Licence No: B0009172 **Dated** 09-Jun-2017 **Issued At** **Weapon owner & Address** KENIA A.

and entitles him to hunt the below animals in the (Game area and blocks) LUNDA NKWAMBI GCA N

owned by GO WILD HUNTING SAFARIS LTD

PH AHMED HUWEL, **PH CAT.** **LICENSE No.**

Additional Blocks

Signature of Holder

Signature of Issuing Officer & Official Stamp

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	BABOON YELLOW	2	
2	BUSHBUCK CHOBE	1	
3	CIVET AFRICAN	1	
4	CROCODILE NILE	1	
5	DIKDIK KIRK'S	1	
6	DOVE	5	
7	DUCK	5	
8	DUIKER HARVEY'S RED	1	
9	ELAND LIVINGSTONES	1	
10	GEESE	5	
11	GENET BLOTCHED	1	
12	HARTEBEEST LICHTEINSTEIN'S	2	
13	HIPPO	1	
14	HYAENA SPOTTED	1	
15	JACKAL SIDE STRIPED	1	
16	KLIPSPRINGER	1	
17	KUDU GREATER	1	
18	KUDU LESSER	1	
19	LEOPARD	1	
20	LION	1	
21	RATEL (HONEY BADGER)	1	
22	REEDBUCK BOHOR	2	
23	SABLE ANTELOPE ROOSEVELT	1	
24	SERVAL CAT	1	
25	WARTHOG	2	
26	WATERBUCK COMMON	1	
27	WILDEBEEST NYASA	2	
28	ZEBRA BURCHELL'S	2	

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer .
3. Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep , transfer.
5. A Professional Hunter conducting a safari must carry his /her PH Licence during the entire safari
6. A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
7. For weapons indicate the heaviest rifle in the case of big game or shortgun in the [illegible] of birds or others in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and or weight and record them in the data sheet provided immediately after an animal shot and its carcass .

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOURISM

WILDLIFE DIVISION

June 29, 2017 11:42:10 am

PERMIT NO. 2004866

CLIENT NAME KENIA ADALINE LINK

COMPANY GO WILD HUNTING SAFARIS LTD

PH NAME AHMED HUWEL,

PH LICENSE NO

14098

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
Buffalo	one	LUNJA NKWAMBI	.416	01.07.17	16,30	M	S 6°59.322'E34°45.824'		Good
Hyaena spotted	one	LUNDA NKWAMBI	.416	02.07.17	8:35	M	S 6°56.521'E34°49.620'		Good
Hippo	one	LUNDA NKWAMBI	.416	04.07.17	10:45	M	S 7°2.701'E34°41.188'		Good
Kudu Greater	one	LUNDANKWAMBI	.416	08.07.17	11:45	M	S 7°1.761'E34°42.671'		Good
Buffalo	one	LUNDA NKWAMBI	.416	09.07.17	10:30	M	S6°55.601'E35°1.041'		Good
Leopard	one	LUNDA NKWAMBI	.416	10.07.17	05:45	M	S6°56.653'E34°49.836'		Good
Kudu Lesser	one	LUNDA NKWAMBI	.416	17.07.17	11:20	M	S7°13.905'E35°26.726'		Good
Lion	one	LUNDANKWAMBI	.416	19.07.17	07:36	M	S6°58.862'E35°7.552'		Good

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

DISTRICT GAME OFFICER
IRINGA DISTRICT

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunti[redacted]

(b)(6)

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

Fw: [EXTERNAL] Re: Go Wild Hunting Safaris (T) Ltd. and Mkwawa Hunting Safaris

Harcum, Heather L <heather_harcum@fws.gov>

Wed 4/8/2020 4:28 PM

To: cc@tawa.go.tz <cc@tawa.go.tz>

Good a. ernoon sirs,

My name is Heather Harcum and I am with the US Fish and Wildlife Service's Internaonal Aff airs program. We are currently reviewing applicaons f or the import of sport-hunted lions from Tanzania and are reviewing several operators for their compliance with TAWA. Could you please read the email chain below with OHPAA and TAHOA in regards to Mkwawa Hunng Sa faris. If at all possible, could you inform us as to their compliance as a regulated and registered hunng oper ator in Tanzania?

Thank you and best regards,
Heather Harcum

From: OPHAA CEO <ceo@ophaa.org>
Sent: Saturday, March 7, 2020 7:52 AM
To: Harcum, Heather L <heather_harcum@fws.gov>
Cc: tahoa@tahoa.org <tahoa@tahoa.org>; chair@ophaa.org <chair@ophaa.org>
Subject: [EXTERNAL] Re: Go Wild Hunting Safaris (T) Ltd. and Mkwawa Hunting Safaris

Dear Heather,

Thank you very much for touching base. I apologise for the belated response, our internet not great because of the rainstorms.

Neither are OPHAA members, which means they do NOT belong to any Tanzanian Association with an agreed and signed Code of Conduct and Constitution.

Tanzania has also responded to your query.

Thank you again for touching base and please feel free to contact us for any other info.

OPHAA represents and promotes legal and ethical fair0chase sustainable hunting in Africa through unity, community support, and cooperation between nationally recognised African hunting associations by means of a code of conduct that is strictly adhered to by each association and their members in their respective country.

Best regards

Danene van der Westhuyzen
Chief Executive Officer

Phone +264 (0)81 129 5536
Address PO Box 9222, Windhoek, Namibia

ophaa.org

This e-mail and/or the documents accompanying it are confidential and may be privileged. It may be read, copied and used only by the intended recipient. If you have received it in error, please contact the sender immediately by return e-mail. Please then delete the e-mail and do not disclose its contents to any person. We believe, but

do not warrant, that this e-mail and any attachments are virus free. You should take full responsibility for virus-checking.

On 3 Mar 2020, at 15:05, Harcum, Heather L <heather_harcum@fws.gov> wrote:

Good morning TAHOA and OPHAA officers and associates,

My name is Heather Harcum and I am a biologist with the US Fish and Wildlife Service. I am currently reviewing an applicaon f or the import of a sport-hunted lion trophy that was harvested in July 2017. The hunter worked with professional hunter Ahmed Huwel and hunted through Go Wild Hunng Sa faris LTD. As we review this applicaon, w e would like to get an understanding of the relaonship be tween Go Wild Hunng Sa faris and Mkwawa Hunng Sa faris (one name was on the hunng license and another on the applic aon).

We would also like to inquire about these two safari compaines and whether they work under a naonally r ecognized hunng oper ator in Tanzania and are in good standing with OPHAA and TAHOA. If not, is there anything we should be aware of and take into consideraon when making our decision?

Very respecully ,
Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115
<Outlook-rs5ozlpx.png>
www.CITES.org

[EXTERNAL] Re: Seeking Additional Information for PRT #69716C, Kenia Link

Aimee Korver <permits@conservationforce.org>

Tue 4/28/2020 2:36 PM

To: Harcum, Heather L <heather_harcum@fws.gov>

1 attachments (101 KB)

Operator Enhcmnt Quest .docx;

Ms. Harcum,

See below the response from the Operator, Benson Kibonde regarding Ms. Link's hunting experience only with Go Wild Hunting Safaris Company Ltd. I believe there was some confusion from the person who had initially worked on the application for us.

See his response below along with the Operator Enhancement Report that he provided for Go Wild Hunting Safaris.

Let me know if you have any further questions.

Thank you

Dear Aimee,

This is to confirm that Kenia Jay Link hunted with Go Wild Hunting Safaris Company Ltd. in Lunda Game Controlled Area North hunting block. I sent you the filled in Operator Enhancement Questionnaire (as Go Wild Hunting Safaris Company Ltd.) for the attention of US FWS. i decline that Kenia hunted with Mkwawa Hunting Safaris Company Ltd..

I do not know where you got the Mkwawa document that you are referring to in your email, which literary has got nothing to do with the Kenia's lion hunt as she hunted with Go Wild Hunting Safaris Company Ltd. not with Mkwawa Hunting Safaris Company Ltd. You are sure that it is not me who sent you the Mkwawa document you have attached in your email.

So I insistently confirm and reiterate that Kenia hunted with Go Wild Hunting Safaris Company as the Operator, not with Mkwawa Hunting Safaris Company Ltd as your email tends to portray.

I am re-sending you the filled in Operator Enhancement Questionnaire (a copy of which you have) as required by US FWS.

I hope I have been thoroughly and correctly understood.

Benson Obdiel Kibonde

Phone: 255-784-88 33 88

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

On April 16, 2020 at 8:51 AM "Harcum, Heather L" <heather_harcum@fws.gov> wrote:

Good morning Aimee,

I am reviewing the operator reports for Mkwawa Safaris, the operator which Ms. Kenia Link hunted with in Tanzania for the import of her sport-hunted lion. We addionally r eceived a report from Go Wild Hunng Sa faris through Conservaon F orce, however I cannot validate them as a registered operator in Tanzania, just a safari company that may have took her out to the operator's concession.

What we received about Mkwawa is a ached. The anecdotal report is good, however a detailed report from the operator including disbursement of funds, lion populaon s tatus, human-lion conflict prevenon, specific an -poaching measur es and successes and their good standing with TAWA should be included for us to make a thorough review. Reports from TAWA are parcularly help ful, if available.

Kind regards,
Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Re: [EXTERNAL] Re: Seeking Additional Information for PRT #69716C, Kenia Link

Aimee Korver <permits@conservationforce.org>

Mon 5/11/2020 3:15 PM

To: Harcum, Heather L <heather_harcum@fws.gov>; John Jackson, III <jjjiii@att.net>

1 attachments (329 KB)

Renewal of allocation - Go Wild (1).docx;

Ms. Harcum,

Please see the attached letter of reallocation for Go Wild Hunting Safari Ltd.

In addition, we would like to point out that all of the documents listed below, which have been previously submitted, confirm the name of the operator as Go Wild Hunting Safari Ltd.

- Game Hunting Permit

-CITES Export Permit

-Operator Enhancement Questionnaire

-Release Orders

-Fumigation Certificate

-Health Certificate

Please, let me know if you need anything further regarding Ms. Link's application.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

On April 29, 2020 at 9:30 AM "Harcum, Heather L" <heather_harcum@fws.gov> wrote:

Good morning Aimee,

Thank you for the clarificaon. Ms. Link had originally placed Mkw awa Hunng Sa faris on her applicaon, ho wever this Safari company provided us with the report and the license. Would Mr. Benson Kibonde be able to provide any TAWA reports indicang tha t his operaon is fully authoriz ed and approved by the government of Tanzania for the 2017 hunng season? W e would like to see this given they are not a registered member with OPHAA/TAHOA.

Thank you,
Heather Harcum

From: Aimee Korver <permits@conserva onforce.org>
Sent: Tuesday, April 28, 2020 2:34 PM
To: Harcum, Heather L <heather_harcum@fws.gov>
Subject: [EXTERNAL] Re: Seeking Addi onal Informa on for PRT #69716C, Kenia Link

Ms. Harcum,

See below the response from the Operator, Benson Kibonde regarding Ms. Link's hunting experience only with Go Wild Hunting Safaris Company Ltd. I believe there was some confusion from the person who had initially worked on the application for us.

See his response below along with the Operator Enhancement Report that he provided for Go Wild Hunting Safaris.

Let me know if you have any further questions.

Thank you

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I am re-sending you the filled in Operator Enhancement Questionnaire (a copy of which you have) as required by US FWS.

I hope I have been thoroughly and correctly understood.

Benson Obdiel Kibonde

Phone: 255-784-88 33 88

Aimee Korver

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Tanzania, just a safari company that may have took her out to the operator's concession.

What we received about Mkwawa is a ached. The anecdotal report is good, however a detailed report from the operator including disbursement of funds, lion populaon s tatus, human-lion conflict prevenon, specific an -poaching measures and successes and their good standing with TAWA should be included for us to make a thorough review. Reports from TAWA are parcularly help ful, if available.

Kind regards,

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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THE UNITED REPUBLIC OF TANZANIA
MINISTRY OF NATURAL RESOURCES AND TOURISM

Phone : No: 026 2321566
Fax No: 026 2321514
E-mail: ps@mnrt.go.tz
Please reply :

Askari Road
Kilimani Area
P.O. Box 1351
40472 DODOMA.

Ref No: **CHA.79/519/01**

29th December 2017

Managing Director,
Go Wild Hunting Safari Ltd,
P. O. BOX 678,
MOROGORO

RE: RENEWAL OF ALLOCATION OF HUNTING BLOCK FOR 2018-2022 HUNTING TERM

Kindly refer to our letter Ref. No. **CHA.79/519/01/130** dated 16th January 2017 regarding the above subject matter.

Under the powers conferred in section 38(6) (11) of the Wildlife Conservation Act No.5 of 2009 and regulation 16(8) of the Wildlife Conservation (Tourist Hunting) Regulations, 2015 and its amendment of 2017 of which you were granted allocation of hunting block (s) for 2018-2022 hunting term with conditions.

Further to those conditions especially item (iv) be informed that, the Ministry decided to transform hunting block allocation modality from administrative allocation to auctioning for the purpose of ensuring transparency and principles of good governance.

In order to allow smooth transition, The Ministry decided to provide two years tenure to all hunting companies. This letter serves to confirm your renewal until 31st December, 2019. Note that, during the two years procedures for auctioning shall take effect.

I wish you all the best.

Dr. Hamisi A. Kigwangalla (MP)
MINISTER

Lion Import Permit # MA69716C-0

Harcum, Heather L <heather_harcum@fws.gov>

Thu 9/24/2020 3:34 PM

To: tommy@linkswildsafaris.com <tommy@linkswildsafaris.com>
Cc: cf@conservationforce.org <cf@conservationforce.org>; Emma C. Sampson <permits@conservationforce.org>

2 attachments (273 KB)
20-09-24_69716C_Final.pdf; WGEN Conditions.pdf;

Good a. ernoon Tommy,

A□ached you will find the import permit (ref # MA69716C-0) for Ms. Kenia Link's sport-hunted lion trophy from Tanzania. This is an official permit and may be printed and copied. Addionally , you will find general wildlife condions a □ached. Please be sure to read through this thoroughly prior to the import of the trophy.

Best regards,
Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-69716C

Enhancement Finding
Applicant: Kenia A. Link

I. Summary:

Ms. Link submitted an application on December 20, 2017, for the importation of one male African lion (*Panthera leo melanochaita*) from Tanzania for the purpose of enhancing the propagation or survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion from Tanzania requires prior issuance of a CITES export permit from the CITES Management Authority of Tanzania, and import into the United States requires prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Tanzania, and other information available to the Service, the Service has determined that the importation of the sport-hunted trophy taken on July 18, 2017, from the Lunda Mkwambe Game Controlled Area (North) in Tanzania **meets** the enhancement criteria under 50 CFR 17.32.

The Service recognizes that legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. We consider whether the management program is actively addressing the current and longer term threats to the subspecies based on sound scientific principles. A management program for a species such as *P. l. melanochaita* is expected to address, at a minimum, an evaluation of population trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating whether the importation of Ms. Link's trophy of *P. l. melanochaita* would be authorized in accordance with our permit issuance criteria, we were particularly interested in examining how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We evaluated how, and how well, the hunting component of the management program addresses these threats by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. We also considered how the participation of a U.S. hunter, in this case, Ms. Link, contributes to the overall management of lions within a country.

We work closely with the range countries and interested parties to obtain relevant information. The government of Tanzania has provided a series of documents, including Tanzania's

"enhancement"[1] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Ms. Link's application, the Tanzania Wildlife Research Institute (TAWIRI), open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

II. U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule that, effective January 22, 2016, listed the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act (USFWS 2015; 80 Fed. Reg. 79999); this species is regulated under a species-specific 4(d) rule of the Act, which is set forth at 50 CFR17.40(r).

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the rule contains the applicable prohibitions and exceptions for the specific species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita* (50 CFR 17.40(r)), all of the prohibitions of 50 CFR 17.31 and permit provisions of 50 CFR 17.32 apply. The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of a commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out these otherwise prohibited activities, including importation, under certain circumstances (e.g., scientific purposes or activities that enhance the propagation or survival of the species), in accordance with the Service's regulations at 50 CFR 17.32. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild (USFWS 2015; 80 Fed. Reg. 79999); 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the issuance criteria under 50 CFR 17.32. However, in some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has made the required enhancement finding based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

[1] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

A. General ESA permitting requirements

As we explained when finalizing the 4(d) rule, our threatened species permitting regulations provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the population in the country where the specimen originated and whether that management of the population addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Tanzania contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of Tanzania's lion management plan provides a net benefit to the subspecies and its ecosystem. For example, several components of a management plan by which trophy imports could meet the issuance criteria might be government incentives in place that lead to increased habitat protection for lions by private landowners and communities, and incentives provided to local communities that lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions.

The Service evaluates an application involving a *P. l. melanochaita* sport-hunted trophy in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b), the following:

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

B. IUCN guiding principles

In addition to these factors, specifically in relation to sport-hunting, in the 4(d) rulemaking for *P.l. melanochaita*, the Service explained it considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P.l. melanochaita*. The Service has, therefore, considered these principles in conjunction with our threatened species issuance criteria in making our determination of enhancement concerning import of the sport-hunted *P. l. melanochaita* trophy that is the subject of this permit application. The IUCN document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources". It recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and, more specifically, the conservation of the hunted species.(IUCN SSC, 2012)

The IUCN document lays out the following five guiding principles:

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure

that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to developing enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the ESA. Before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

III. Basis for Finding:

As explained above, any person wishing to conduct an otherwise prohibited activity, including import of *P. l. melanochaita* specimens, must first obtain a permit as required by 50 CFR 17.32; issuance of an import permit for a sport-hunted trophy of *P. l. melanochaita* requires an enhancement finding.

The Service has made the required enhancement finding for this import permit based on this individual application to import a sport-hunted trophy of *P. l. melanochaita* taken in Tanzania. Additionally, as detailed below, relevant information obtained for Tanzania as a whole, has been considered. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"[2] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Ms. Link's application, the TAWIRI, open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

On April 14, 2016, the Service sent a letter to Mr. Herman Keraryo, Acting Director of Wildlife for the Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT), with a list

[2] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

of questions that would aid the Service in evaluating the overall conservation and management of the lion population in Tanzania, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to our April 14, 2016 letter, the MNRT provided a series of documents, including Tanzania's "enhancement" and non-detriment finding for lions.

Upon invitation, a U.S. delegation of Service personnel visited Tanzania in November 2018 to observe the challenges and successes of conserving wildlife, including lions, in Tanzania. This trip allowed first-hand exposure to the on-the-ground implementation of policies and procedures the government has put into place to conserve lions. Detailed discussions with government officials, national experts, land managers, game officers, village leaders, and leaders in the hunting industry, as well as site visits to different models of hunting operations, served to both substantiate and elucidate information provided in documents. We determined that the status of lions and the management approach of Tanzania are substantially as presented, conferring confidence to the conclusions drawn from information provided.

IV. Governance of Wildlife in Tanzania:

In Tanzania, wildlife resources, such as lions, are protected under several Acts of Parliament, establishing the authority for all aspects of wildlife management, including law enforcement activities. The **Wildlife Conservation Act** (WCA) of 2009, which replaced the original WCA of 1974, provides the legal framework for operation of the Wildlife Division under the MNRT, including the appointment of the Director of Wildlife. The WCA provides for the establishment of a Wildlife Protection Unit granted paramilitary status to protect wildlife against unlawful utilization, and a Wildlife Authority to manage all Tanzania wildlife located outside the boundaries of the National Parks and the Ngorongoro Conservation Area. The Wildlife Authority is also responsible for meeting international obligations involving wildlife conservation. The WCA ensures the protection of natural habitat and wildlife through the establishment of a network of Protected Areas (PAs), e.g., Game Reserves, Game Controlled Areas, Wildlife Management Areas, and areas such as wildlife corridors. The **National Parks Act** (CAP 282 R.E. 2002) establishes the legal authority for the creation and management of national parks, granting powers to the Director to enable maintenance and security within national parks, as well as the responsibility for the protection of their wildlife resources. The **Ngorongoro Conservation Act** (CAP 284 R.E. 2002) provides the legal framework for the existence of the multiple land use in the Ngorongoro Conservation Area, its Management Authority under the direction of the Conservator, and the authority for its maintenance and security. The **TAWIRI Act** (CAP 260 R.E. 2002) grants powers to the Director who is responsible for research involving wildlife, and for providing this information to the Wildlife Authorities.

The responsibility for managing Tanzania's wildlife currently falls primarily under four institutions. The **Tanzania Wildlife Research Institute** (TAWIRI) is responsible for conducting and coordinating wildlife research in Tanzania. It functions as the scientific authority for wildlife conservation and management, and the CITES Scientific Authority for Tanzania. The **Tanzania National Parks Authority** (TANAPA) is responsible for managing 15 National Parks with a

total area of 50,872 sq.km. In the national parks, only non-consumptive utilization (tourism game viewing) of wildlife resources is allowed. **Ngorongoro Conservation Area Authority** (NCAA) is responsible for management of only one area, the Ngorongoro Conservation Area, a protected area of 8,300 km^2. It is the only multiple land use wildlife area in Tanzania in which the consumptive utilization of wildlife is not permitted. Both TANAPA and NCAA are parastatal – public organizations, but not directly run by the government; all revenue is kept by the organizations for use in management of these areas.

The Wildlife Division has historically been responsible for the country's wildlife resources located outside the jurisdiction of the Ngorongoro Conservation Area and Tanzania National Parks. However, in response to concerns over questionable management practices and lack of adequate funding for the Wildlife Division to successfully manage wildlife resources, the **Tanzania Wildlife Management Authority** (TAWA) was established in 2014[3]. Also a parastatal organization, TAWA operates with significant autonomy and retains all revenue generated from hunting[4]. TAWA became operational in July 2016, and has since established an aggressive, proactive approach to protecting wildlife. In addition to conducting routine anti-poaching patrols, TAWA is actively building capacity with technology (e.g., GIS), relationships with local communities (e.g., intelligence-led operations), and collaborative efforts on an international scale.

TAWA is responsible for the management of 28 Game Reserves with an area of 112,564 km^2, approximately 38 Game Controlled Areas covering about 161,521 km^2, and Ramsar sites covering 249,856 km^2. There are also District Councils, local government institutions that work in collaboration with the TAWA. These councils oversee wildlife conservation issues and facilitate the establishment and management of Wildlife Management Areas (WMAs) on village lands.

WMAs were established as a new category of wildlife conservation areas consisting of settled and unsettled lands outside PAs, with the goal of allowing for rural communities and private landholders to manage wildlife on their land for their own benefit, shifting wildlife such as lions from a liability to an asset. The framework for WMAs was outlined in Tanzania's Wildlife Policy of 1998 (revised in 2007), with legislation established under the Wildlife Management Areas Regulations of 2002, authorizing the formal establishment of WMAs. From 2010 to 2014, over 1.3 million USD from hunting fees were disbursed to WMAs (TAWA, 2016). In 2012, Tanzania amended its Wildlife Management Area Regulations to provide a new basis for strengthening the links between local communities and wildlife management by addressing the issues of benefit sharing and control over concession allocations. Under the new regulations, the WMAs receive approximately 60-65% of the total hunting revenue occurring within the block. Additionally, WMAs gained the power to sign utilization contracts with the private sector, enabling seven WMAs to sign contracts with hunting operations worth more than 4.3 million USD (TAWA, 2016). The establishment of these WMAs has resulted in an additional 23,700 km^2 of Tanzania's land area being added to its conservation network and increased capacity for protected area management through the training of village game scouts and WMA managers.

The tourism industry, largely wildlife-based, contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates

[3] Prior to the establishment of TAWA, funding to the Wildlife Division was paid by the central treasury; inadequate funding left the Wildlife Division unable to effectively manage and protect Tanzania's wildlife resources.
[4] The mandate to collect and retain revenue from trophy hunting is enshrined in "The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order 2014.

almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations. The three parastatal organizations, TANAPA, NCAA and TAWA, retain 100% of their revenue share. Both TANAPA and NCAA are generally self-sustaining; consequently, National Parks and equivalent areas such as Ngorongoro Conservation Area, with an area covering approximately 38% of all PAs in Tanzania, are adequately funded. The sustainable utilization of resources (i.e., hunting) accounts for 70% of TAWA revenue; therefore, the viability of TAWA will depend, in part, on sufficient revenue from safari hunting. In 2012/2013, the Government of Tanzania re-established the Selous Game Reserve Revenue Retention Scheme, whereby 50% of the revenue generated from photographic tourism and tourist safari hunting is retained in order to meet management and enforcement costs in the Selous Game Reserve, one of the largest protected areas in Africa. Again, the viability of the Selous will depend, in part, on sufficient revenue from safari hunting.

Tanzania is a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Tanzania provided a copy of their CITES non-detriment finding (NDF) for lions, which finds that the export of the species will not be detrimental to the survival of the species in the wild.

Tanzania is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. As required of a member state, Tanzania has established management programs for the conservation and sustainable use of wildlife.

V. Status of Lions in Tanzania:

Approximately 40% of all lions in Africa are found in Tanzania (Riggio et al., 2013). The lion range in Tanzania covers over 90% of land (Mesochina et al., 2010), with four main subpopulations:

1. the Maasailand Ecosystem, which encompasses the Mara, Arusha Kilimanjaro and Manyara Regions of northeastern Tanzania;
2. the Kagera and Kigoma Regions of northwestern Tanzania;
3. the Rukwa, Tabora and Mbeya Regions of central and western Tanzania;
4. Selous Ecosystem, which encompasses the Lindi, Morogoro and Ruvuma Regions of southern Tanzania.

TAWIRI presents Tanzania's latest lion population estimates as 16,800 individuals (Mesochina et al., 2010), and 17,564 (12,208-19,320) (Ikanda & Packer, 2006). They estimate that 13,600 (or 81%) of these lions occurred within PAs and approximately 3,200 (or 19%) individuals occurred outside PAs. According to Riggio et al. (2013) and Björklund (2003), the minimum number of lions estimated to categorize an area as a lion stronghold is 500 individuals. The estimated population size of the four main lion ecosystems was 3,700 in the Maasailand Ecosystem, 520 in Kagera and Kigoma Regions, 2,300 in Rukwa, Tabora and Mbeya Regions, and 7,200 in the Selous Ecosystem.

Trend analysis of the lion population in Tanzania is limited due to the sporadic nature and variable methodology of past surveys, as well as the difficulty of obtaining precise lion counts (Brink, Smith, & Skinner, 2013; Funston et al., 2010), but it is suggested that, nationally, far fewer lions exist today than did 50 years ago (Ikanda, 2008). Available information suggests that this may be spatially variable, e.g., declining populations in Katavi and Tarangire (Bauer et al., 2015) and stable populations in the Selous Game Reserve (Packer et al., 2011).

VI. Management of Tanzania's Lion Population

In recognition of the role that Tanzania plays in the conservation of this species, a workshop was held in 2006 to assess available information and to set priorities for conservation of the lion in Tanzania. The Tanzania Lion and Leopard Conservation Action Plan (TAWIRI, 2009) provided an overview of this workshop and outlined a national strategic plan for lion conservation. Habitat loss and increased conflict with humans had been identified as the major threat to the species. The Tanzania Lion and Leopard Conservation Action Plan (Plan) concluded that, for those lion populations existing outside National Parks, well-run trophy hunting programs could be leveraged to successfully manage and conserve lions against these threats. To that point, the majority of permanent lion range in Tanzania lies within protected areas, 61% of which are designated as hunting areas (Mesochina et al., 2010).

A. Hunting:

Hunting of lions is allowed across much of Tanzania. Safari hunting occurs in areas known as hunting blocks, designated in Game Reserves, Game Controlled Areas, Open Areas, Forest Reserves and WMAs. Until recently, blocks were allocated using an administrative process. The government would invite hunting companies to apply to operate a hunting block; interested hunting companies were evaluated by the Hunting Block Advisory Committee. Hunting companies were allocated blocks for a period of five years, with a reporting requirement on the third year to determine compliance under the terms outlined within the hunting block regulations (TAWA, 2016). However, in 2017, it was announced that the block allocation process would be amended to introduce an auction system.

Wildlife hunting in Tanzania is based on hunting regulations set forth in Tourist Hunting Regulations No. 306 (2002). The regulations specify the fees for hunting different species, and further specify a minimum number of hunting days. Hunters are required to purchase a minimum 21-day safari in order to request a permit for the harvest of lions, as well as other specified animals (e.g., elephant, leopard). Hunters must pay a number of different fees for permits and licenses to be granted harvest authorization. The game fee to hunt a lion is the second highest game fee in Tanzania, second only to elephants.

A quota system historically was the primary method of regulating trophy hunting in Tanzania. Annual harvest quotas have been lowered over the past decade, from 520 in 2008-2009 (Lindsey et al., 2013) to 315 in recent years (TAWA, 2016). In 2016, the annual quota was further reduced to 200 individuals (TAWA, 2016). An annual quota of 200 individuals is well within the suggested sustainable 1 lion/2000 km^2 harvest rate identified by Packer et al. (Packer et al., 2011), and 25% below the sustainable harvest level suggested by TAWIRI (TAWA, 2016). However, the Plan noted the lack of scientific justification underlying that system. Furthermore, a quota system is reliant on

accurate population estimates, a near impossibility with lions. A model that simulated the dynamics of populations as a function of both quota size and age at harvest showed that there is almost no negative affect on population size when hunting is restricted to males six years or older (Whitman, Starfield, Quadling, & Packer, 2007). Restricting lion hunting by age would reduce the reliance on population estimates – an intensive and expensive effort that does not reliably return accurate results – while minimizing the effect on a lion population. Tanzania was the first country in African lion range states to officially establish age restriction rules, prohibiting hunting lions of an age below six years (section 27(1) of the Tourist Hunting Regulations of 2015). Violations of this regulation can result in penalties for the professional hunter guiding the offending hunter, including fees and revoking of the professional hunter's license.

Although inspection of trophies are required prior to export, the fundamental difficulties of accurately estimating lion age, as well as a disregard for these regulations, can result in the take of lions younger than six years. Tanzania has consequently maintained a quota system, set by hunting block according to the lions harvested during the previous hunting season. If a trophy lion is estimated to be 4-6 years, the hunter/client may export that lion, but the quota for the hunting block where the trophy was taken is reduced for the following hunting season. If a trophy is taken below the age of 4, there is a reduction of the hunting block's quota of harvestable lions by 2 and potential cancellation of the hunter's license along with other penalties such as the trophy not being eligible for export. If the trophy meets the criteria of 6 years of age or older, the hunting block's quota remains unchanged for the following hunting season. According to MNRT, these regulations have been in place since the 2012/2013 hunting season. For each trophy harvested, a compulsory hunter evaluation form, photos along with presentation of lion skull to officials for inspection and measurements, including tooth x-rays, are necessary prior to the issuance of an export permit (MNRT, 2015; TAWA, 2016).

B. Human-Lion Conflict:

It is difficult to estimate how many lions are killed illegally each year; however, retaliatory killings may be as high as 200 individuals annually (TAWA, 2016). Lions are provided protection from illegal or retaliatory killing under the Fourth Schedule due in part to human/livestock-conflict under the Dangerous Animals Damage Consolation (Government Notice No. 146) of 2011; unauthorized personnel are not permitted to kill a conflict lion unless under exceptional circumstances. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

VII. Evaluation:

In evaluating whether the importation of Ms. Link's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our permit issuance criteria, we examined how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We considered whether the management program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We evaluated government incentives designed to increased habitat protection for lions by private

landowners and communities, and incentives provided to local communities designed to lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions. We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. As such, we examined if the trophy hunting provides financial/resource assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how a U.S. hunter's, in this case, Ms. Link's, participation in the hunting program contributes to the overall management of lions within the country.

As stated earlier, the Service has evaluated this application in accordance with our regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine for this application that the import of the wild lion trophy animal would enhance the propagation or survival of the species in the wild and qualifies for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the proposed activity in this permit application (import of a trophy hunted lion from Tanzania) has demonstrated the ability to contribute towards positive conservation outcomes that mitigate or improve the status of lions throughout their range while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion that collectively contribute towards continued population declines.

Tanzania faces a growing human population, and a subsequent development of land and increasing rates of human-wildlife interactions. Protection of suitable habitat for both the lion and its prey is essential for the survival of the lion, as well as developing and sustaining the local communities' support for such policies. Wildlife protected areas, in various forms, cover about 40% of Tanzania's land area, and safari hunting has created a financial incentive to maintain these protected areas as a land use. Both the consumptive and non-consumptive utilization of wildlife resources contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations.

The companies awarded a hunting block are in a key position to conserve this land for wildlife, and are annually evaluated by the Tanzania government on several criteria, including the maintenance of prey populations, contributions/provision of benefits to the local villages, improvement to infrastructure, protection of the environment, and anti-poaching operations.

Ms. Link hunted with Go Wild Hunting Safaris (T) Ltd, a subsidiary of Mkwawa Hunting Safaris (T) Ltd which owns a hunting block in the Lunda Mkwambe Game Controlled Area (North), bordering Ruaha National Park on its eastern side. This safari company has developed several programs by which to address the main threats to lion populations.

- The company maintains anti-poaching efforts to protect against potential threats to habitat loss and the loss of game. Go Wild Hunting Safaris (T) Ltd, established in 2013, maintains six full time, local employees that work on an anti-poaching team, four of which are scouts or rangers. The company has established a routine of conducting two ten-day patrols per month, and are equipped with a vehicle, tents, and rifles for protection. Rewards are additionally offered to community informants that eventually lead to arrest. Between the years 2017 and 2019, 7,500 USD were spent on rewards to community informants. The results of which included 70 poaching incidents discovered, 30 meat poachers arrested, 105 snares and traps collected, and 30 vehicles confiscated.

- The company protects prey base species by setting low off-take quotas, and mandating that professional hunters take only mature adults.

- The company uses data from the anti-poaching unit, professional hunters, and trackers to monitor the estimated population of species in the 2,436 square kilometer hunting block. The estimated population of lion is approximately 50 individuals, which exceeds the 1 lion per 1,000 km target for sustainable use. The population was identified as being stable, and of these lions, 4 were hunted between 2017 and 2019.

It has been stated that upwards of 200 lions are killed annually due to preemptive strikes or as retaliatory actions after some form of direct loss is experienced by an individual or community (TAWA, 2016). In the Ruaha communities surrounding hunting blocks and the Ruaha National Park, researchers reported 35 large carnivores were killed over an 18-month period. Similarly, Lichtenfeld et al. (2015) reported that in 12 communities of the Maasai Steppe region, more than 50 attacks by large carnivores on livestock resulted in retaliatory killing of 72-84 lions. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

As described above, we have determined that the government of Tanzania and Go Wild Hunting Safaris (T) Ltd. contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Tanzania. Further, the fees garnered through Ms. Link's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:</u>

A myriad of issues and factors, largely related to an increasing human population, complicate and put at risk the management of Tanzania's wildlife (Kideghesho, Rija, Mwamende, & Selemani, 2013). It is likely that the lion populations that exist outside of protected areas will continue to decline (Riggio et al., 2013), making the existence of these protected areas all the more important. The trophy-hunting program in Tanzania provides a revenue source necessary to maintain and manage protected areas from encroachment or elimination.

It is a widely supported belief that increasing the benefits for those who live with and bear costs of wildlife damage or injury by wildlife can increase tolerance of wildlife, especially of large carnivores (e.g. lions) (Bencin, Kioko, & Kiffner, 2016; Lindsey et al., 2013; Winterbach, Winterbach, Somers, & Hayward, 2012). Ms. Link hunted with Go Wild Hunting Safaris (T) Ltd., a subsidiary of Mkwawa Hunting Safaris (T) Ltd which, as outlined below, will provide an indirect benefit to the lion population by generating revenue to help support and maintain a hunting block where lions are found. Mkwawa Hunting Safaris (T) Ltd is required by Tanzanian law to pay a direct 5,000 USD community development fee to the villages in the hunting area. There are estimated to be 30,000 people in the villages surrounding this hunting block. The company has contributed more than the base requirement, aiming to develop and maintain a strong relationship with these villages. In addition to direct financial assistance, the company employs villagers in both permanent positions and short-term projects, including construction of roads and providing medics and food. The Service is further encouraged by the recent action taken by the MNRT to amend the WMA regulations enabling these communities to receive a greater proportion of revenues returned on wildlife uses.

Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

The government of Tanzania has implemented a number of policies and regulations to monitor and control the harvest of lions in the country.The issuance of an import permit for a lion legally hunted in Tanzania does not conflict with any programs intended to enhance the survival probably of the species in Tanzania.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, almost 40% of all remaining lions are found in Tanzania. The lions located within protected areas are under the legal authority of MNRT, as well as subjected to direct management activities by hunting companies. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the maintenance of these protected areas by hunting companies is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. The cost of operating a hunting block is considerable, and lion safaris are a large source of revenue for hunting companies. This revenue is, in part, what allows the company to first and foremost maintain a presence in this protected area, and subsequently maintain an anti-poaching program, and to aid in local community development, all factors which reduce the threats faced by lions.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt associated with Ms. Link's application contributes to reducing the threat of extinction of lions in Tanzania. The utilization of hunters such as Ms. Link in supporting the safari hunting industry is an important element of the success of lion management in Tanzania.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduce the threat of extinction facing lions in Tanzania.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that legal and sustainable harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

The long-term survival of lions in Tanzania is tied directly to the success, both ecologically and economically, of the protected areas. Based on our understanding of the hunting block allocation and management, companies must submit annual reports that address several criteria, including the maintenance of key prey populations, contributions to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

Therefore, based on the information available to the Service, the applicant hunted on a hunting block that carries out their management practices in accordance with national regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

VIII. Conclusion

As stated earlier, this application received by the Service for the import of a sport-hunted trophy lion from Tanzania has been evaluated on an individual basis. The major threat facing lions today is the loss of habitat to humans, and the subsequent consequences of living among humans (e.g., decrease of prey base due to bush-meat consumption, increase in human-lion conflict). The occupation and maintenance of hunting areas by hunting concessions -- an industry supported by U.S. hunters such as Ms. Link -- protects lion and prey habitat through legal hunting by preventing conversion of such land to other uses, thereby contributing to the enhancement of this species. In addition, the financial benefits to local communities generated from lion safari hunting creates incentives for protection of lions, resulting in fewer lions lost as a result of human-lion conflict, which further contributes to enhancement of this species. Given the status of lions in Tanzania and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant hunted on a hunting block that is actively managing lions in a manner that mimics natural processes. The applicant attests in the application that the hunt occurred on a properly licensed hunting block, and this finding is contingent on the hunting block where the lion was taken, having been properly licensed and fully in compliance with national and local regulations.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of the sport-hunted trophy of this wild lion will enhance the propagation or survival of the species in the wild. Therefore, the Service **is able to authorize the import of one male trophy lion taken from the wild in Tanzania, to Kenia A. Link, Wascott, WI.**

HEATHER HARCUM
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Date: 2020.09.24 14:32:02 -04'00'

Heather Harcum, Biologist
Branch of Permits
Division of Management Authority

AMY BRISENDINE
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Date: 2020.09.24 15:20:20 -04'00'

Mary Cogliano, Ph.D., Chief
Branch of Permits
Division of Management Authority

References

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L. T. B., . . . Packer, C. (2015). Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. *Proceedings of the National Academy of Sciences of the United States of America, 112*(48).

Bencin, H., Kioko, J., & Kiffner, C. (2016). Local people's perceptions of wildlife species in two distinct landscapes of northern Tanzania. *Journal for Nature Conservation, 34*, 82-92.

Björklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (*Panthera leo*). *Conservation Genetics, 4*(4).

Brink, H., Smith, R. J., & Skinner, K. (2013). Methods for lion monitoring: A comparison from the Selous game reserve, Tanzania. *African Journal of Ecology, 51*(2).

Funston, P. J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A., Macdonald, D. M., . . . Ferreira, S. M. (2010). Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology, 281*(1), 56-65.

Ikanda, D. K., & Packer, C. (2006). *Lion abundance and distribution in Tanzania - A status report to the Wildlife Division.* Unpublished manuscript.

Ikanda, D. K. (2008). *Non-detriment report under CITES regarding the export of African lions (Panthera leo) from the United Republic of Tanzania.* NDF Workshop Case Studies, WG5 - Case study, 20 pages.

IUCN SSC. (2012). *IUCN SSC guiding principles on trophy hunting as a tool for creating conservation incentives. ver. 1.0.* IUCN, Gland.

Kideghesho, J., Rija, A., Mwamende, K., & Selemani, I. (2013). Emerging issues and challenges in conservation of biodiversity in the rangelands of Tanzania. *Nature Conservation, 6*(18), 1-29.

Lichtenfeld, L., Trout, C., & Kisimir, E. (2015). Evidence-based conservation: Predator-proof bomas protect livestock and lions. *Biodiversity and Conservation, 24*(3), 483-491.

Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., . . . Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PLoS One, 8*(9).

Mesochina, P., Mbangwa, O., Chardonnet, P., Mosha, R., Mtui, B., Drouet, N., . . . Kissui, B. (2010). *Conservation status of the lion (Panthera leo linnaeus, 1758) in Tanzania.* Paris.

MNRT. (2015). *Comment on ESA status review of African lions, January 27, 2015*. Ministry of Natural Resources and Tourism, Dar es Salaam.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H., & Caro, T. (2011). Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology, 25*(1).

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., . . . Pimm, S. (2013). The size of savannah Africa: A lion's (*Panthera leo*) view. *Biodiversity and Conservation, 22*(1).

TAWA. (2016). *Non-detriment findings on African lion (Panthera leo) in the United Republic of Tanzania, including enhancement findings*. Tanzania Wildlife Management Authority, Tanzania.

TAWIRI. (2009). *Tanzania carnivore conservation action plan*. TAWIRI, Arusha, Tanzania.

Whitman, K. L., Starfield, A. M., Quadling, H., & Packer, C. (2007). Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions. *Conservation Biology.*

Winterbach, H. E. K., Winterbach, C. W., Somers, M. J., & Hayward, M. W. (2012). Key factors and related principles in the conservation of large African carnivores. *Mammal Review, 43*, 89-110.

WTTC. (2017). *Travel and tourism. Economic impact 2017: Tanzania*. World Travel & Tourism Council, United Kingdom.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Heather Harcum Date: 09/22/2020

Telephone Number: 703-358-2350

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)
Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, **Kenia A. Link** (PRT #**69716C**) has requested a permit to import a trophy of one lion that she lawfully hunted in Tanzania. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Tanzania on the date specified in the permit application. The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Tanzania. The requested U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Tanzania. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

	Determination
No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.**	**X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.09.24 14:13:40 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence _____** **Nonconcurrence _____**

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature:_____ Date: _____

LION TANZANIA ESA TROPHY

Permit Number: MA69716C-0

Effective: 09/24/2020 Expires: 09/23/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.09.24 15:21:06 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KENIA ADALINE LINK
(b) (6)
WASCOTT, WI 54890
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12.

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.
B. Specimen may not be sold or transferred for any financial remuneration.
C. Trophy must have been taken during the 2017 hunting season.
D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2017 season.
E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II re-export certificate, source code "W", issued by the Management Authority of Canada.
F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
H. Valid for use by permittee named above.
I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 26 2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Whitworth	Kenneth	Wayne	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying as a business, agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Hardinsburg	KY	40143	Breckinridge	U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
(b) (6)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
Hardinsburg	KY	40143	Breckinridge	U.S.A.

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Kenneth (b) (6) Whitworth — 03/16/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Kenneth Wayne Whitworth

(b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo melanochaita
   b. Sex (if known).
   Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   South Africa
   Associated Private Nature Reserves- Umbabat Private Nature Reserv
   Hoedspruit

   b. Date wildlife is to be hunted:
   May 26th 2018 to June 24th 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Graham Sales Safaris

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I have not hunted yet, and do not currently hold any such permits or licenses.
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name:
   Business Name: Life-Form Taxidermy
   Address: No 7 Aluminum Road / PO Box 763
   City: White River
   State/Province: Mpumalanga
   Country, Postal Code: South Africa 1240

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?
   Please See the included document from Bomo Edith Edna Molewa, Minister of Environmental Affairs.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
   Lion License Fee = $850. Lion Trophy Fee = $42,850. Please see the included document from Bomo Edith Edna Molewa, Minister of Environmental Affairs.

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
   This is the first Lion to be hunted in the Umbabat which forms part of the APNR (Associated Private Nature Reserves)

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only impo[redacted]

Applicant's [redacted] Date: 03/16/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Government Gazette
Staatskoerant

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REPUBLIEK VAN SUID AFRIKA

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GENERAL NOTICES • ALGEMENE KENNISGEWINGS

DEPARTMENT OF ENVIRONMENTAL AFFAIRS

NOTICE 19 OF 2018

NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004

(ACT NO. 10 OF 2004)

NON-DETRIMENT FINDINGS

I, Bomo Edith Edna Molewa, Minister of Environmental Affairs, hereby publish the non-detriment findings made by the Scientific Authority in terms of section 62 of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) for implementation and set out in the Schedule hereto.

BOMO EDITH EDNA MOLEWA
MINISTER OF ENVIRONMENTAL AFFAIRS

Non-detriment finding assessment for *Panthera leo* (African lion)
Reference Number: Pan_leo_Sep2017
Date: 25 September 2017
Issued by the Scientific Authority of South Africa

Summary of findings

The South African population of *Panthera leo* (African lion) is included in Appendix II to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). In terms of Article IV of the Convention, an export permit shall only be granted for an Appendix II species when a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species. This document details the undertaking of a non-detriment finding (NDF) assessment (Figure 1) for the African lion and is based on the best available information, current as of September 2017.

African lions are long-lived with both sexes living longer than 12 years. The species has a low reproductive rate with females replacing themselves only every second year. The African lion is a generalist species that can utilize a wide range of habitats and prey species. Due to biological, social and anthropogenic constraints, dispersal ability of both sexes is relatively poor, although some long distance dispersal of males does occur. The species is sensitive to human activity and is conservation dependent in South Africa, occurring solely in state-protected areas and on a limited number of privately owned game reserves, all of which are fenced.

The African lion is considered an uncommon species within South Africa, with a restricted and fragmented distribution. The total national wild population is estimated at approximately 2876 individuals in an estimated land area of 41 745 km^2. Eighty-three percent of the population is well protected, primarily within the Kruger National Park, the Kgalagadi Transfrontier Park and the Hluhluwe iMfolozi Park, where recent quantitative data suggest that lion populations are stable to increasing. The remainder of the national population (approximately 500 individuals in a combined area of ca. 8500 km^2) occurs in 45 small reserves where lions have been re-introduced and are intensively managed. This healthy wild lion population persists alongside a large captive population of approximately 7 000 lions kept in around 260 breeding/captive facilities in South Africa.

At present there are no major threats to the wild and managed lion populations within South Africa, although the management of re-introduced wild lion needs some improvement. Minor threats include overutilization, disease, poaching and conflict with communities around protected areas. Although there are no specific figures on the illegal trade of lions in South Africa, provincial conservation authorities indicate that illegal utilization of wild lion is generally small to negligible. The trophy hunting of captive-bred lions poses no threat to the wild lion population within South Africa, and it is thought that captive lions may in fact serve as a buffer to potential threats to wild lions by being the primary source of hunting trophies and derived products (such as bone). Up until early 2016 when the USA stopped the import of lion trophies from South Africa due to the listing of *Panthera leo* as threatened on the

Endangered Species Act, the bone in trade was primarily a by-product derived from captive lion trophy hunts.

As part of a comprehensive management approach for lion, a Biodiversity Management Plan (BMP), which includes a meta-population management plan and several actions relating to the management of captive lions, was developed in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004. However, since the BMP was published for implementation only recently (in December 2015), its effectiveness cannot yet be assessed. Local level management plans are however effectively implemented.

Hunting of lion is not allowed in any of the national parks and only limited hunting is allowed in some provincial state reserves, effectively ensuring strict protection of the majority of the wild population (>80% of the total lion population). Harvest of wild lion in the South African context is primarily for the control of damage causing (stock-raiding) lions and population management. Off-takes of lion (translocation and culling) within South African National Parks are associated with ecological management interventions and guided by a robust scientific framework. All re-introduced wild populations are at times managed through culling and translocation to mimic the population dynamics processes that are absent in small populations. This ecological harvesting benefits the conservation of the species.

Consumptive use of lion for commercial purposes is mostly restricted to private game reserves. In South Africa very few wild lions are trophy hunted each year (typically less than ten lion involving less than 5% of lion hunts on private property), and hunting trophies are largely sourced from captive populations. Off-takes from wild lion populations are managed on a local scale with ecologically based local quotas. In some cases there are local, informal management plans and approved local management plans for specific reserves that govern the type of lion that may be hunted, typically male lions over six years of age. Guidelines for the trophy hunting of wild lions in South Africa have been developed and now form part of permit conditions within the provinces. In most provinces, off-takes are effectively monitored through the attendance of lion hunts by provincial conservation officers. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat.

In conclusion, the NDF assessment undertaken for the African lion (Figure 1) demonstrates that legal local and international trade poses a low to moderate, but non-detrimental risk to the species in South Africa (Figure 2). The species is well managed and the Scientific Authority does not have any current concerns relating to the export of wild lion in accordance with Article IV of CITES. It is recommended that hunting of lion from reserves smaller than 1000 km^2 be permitted only when in accordance with a meta-population management approach, and that guidelines be developed in this regard.

The Scientific Authority does not consider the export of captive-bred lion trophies or captive-bred live lion for zoological or breeding purposes to be detrimental to the wild lion population in South Africa. At present there is no evidence to suggest that the lion bone trade between South Africa and East-Southeast Asia is detrimental to South Africa's wild lion population. In accordance with the annotation to the Appendix II listing of the African lion that was adopted at the 17th Conference of the Parties to

CITES, a quota for the export of skeletons derived from captive breeding operations must be established and revised on an annual basis to ensure sustainability, and measures must be implemented to prevent any detrimental impact to wild lion populations.

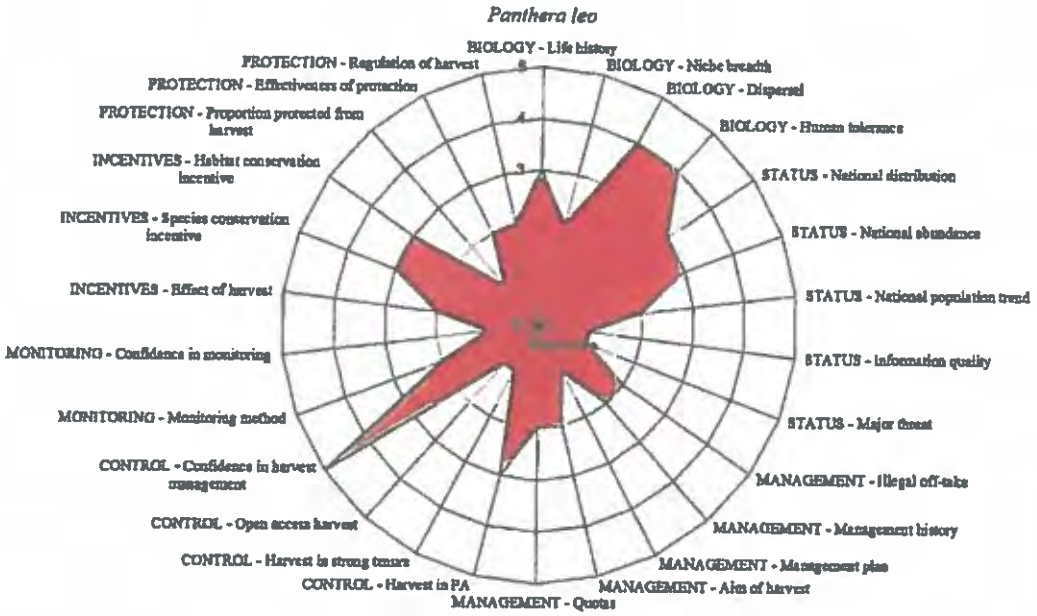

Figure 1: Radar chart summarizing the non-detriment finding assessment for *Panthera leo* (African lion) in accordance with the CITES NDF checklist. Explanations of scores given are detailed in Table 1. Higher scores are indicative of higher risks to the species. The limited area shaded in the radar chart demonstrates an overall low to moderate risk to the species.

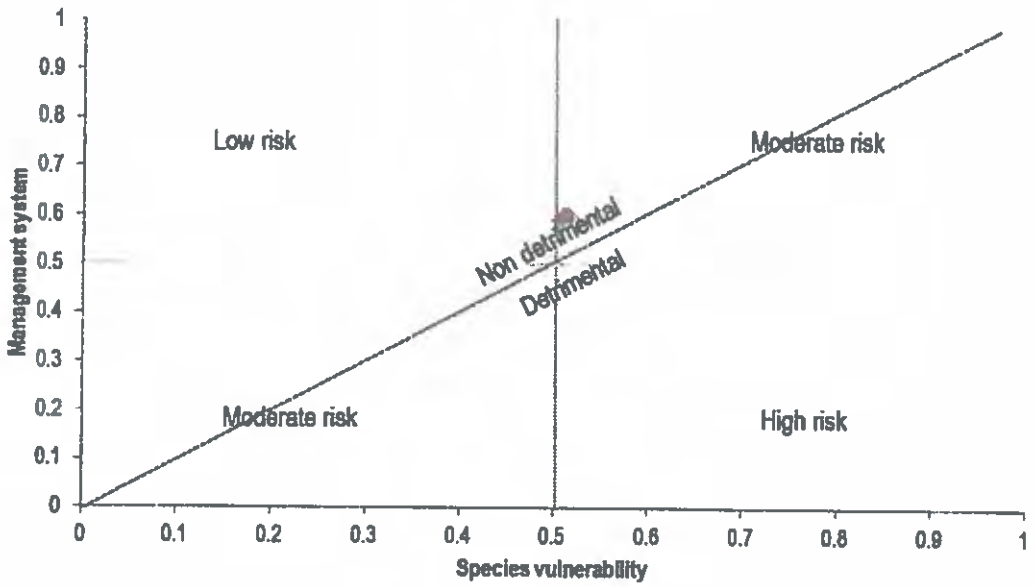

Figure 2: The level of risk of harvesting for *Panthera leo* (African lion) as represented by the relationship between species vulnerability (biology and status) (0 = low vulnerability; 1 = high vulnerability) and the management system to which the species is subjected (management, control, monitoring, incentives and protection) (0 = weak management system; 1 = strong management system). The figure shows that the species is at a low to moderate risk and trade is not detrimental.

Table 1: Detailed NDF assessment for *Panthera leo* (African lion) undertaken in accordance with the CITES NDF checklist. Scores assigned to each question are indicated (bold text and shaded blocks) along with detailed explanations/justifications where relevant. Higher scores are indicative of higher risks.

Biological characteristics		
1. Life history: What is the species' life history?	High reproductive rate, long-lived	1
	High reproductive rate, short-lived	2
	Low reproductive rate, long-lived	**3**
	Low reproductive rate, short-lived	4
	Uncertain	5
Lions are long-lived. Lionesses can live up to 14-16 years, while most males live up to 12-14 years in the wild (Packer et al. *1988). Litter size can range from one to six cubs, with 98% of litters containing 1-4 cubs (Packer & Pusey 1987). In general, there is high cub survival with >50% survival in the first year of life, which leads to longer birth intervals. At present the birth interval for Kruger National Park (KNP) is 2.3-2.4 years and ranges between 2.5-3.5 years within savannah woodland systems. If a female produces three cubs every 2.5-3 years, the net effect is approximately one cub per year. Fecundity is defined as the number of females that a female produces over her lifetime to replace her. Thus in the case of lions within South Africa, a female produces on average a female every second year if a 1:1 sex ratio is assumed, and lions therefore have a low reproductive rate.*		
2. Ecological adaptability: To what extent is the species adaptable (habitat, diet, environmental tolerance etc.)?	Extreme generalist	1
	Generalist	**2**
	Specialist	3
	Extreme specialist	4
	Uncertain	5
Within South Africa the majority of lions occur in savannah, but they have also been successfully reintroduced to the subtropical thicket biome of the Eastern Cape and the semi-arid Nama Karoo biome (Karoo National Park). Lions readily adapt to hunting in varied habitats, generally having greater success when hunting in areas with longer grass (Funston et al. *2001) or greater cover (Hopcroft* et al. *2005). Species at the top of the food chain, such as predators, are mostly considered specialists. However within the large carnivore guild, lions can be considered generalists when compared to other large mammals as they utilize a wider range of habitats and prey species.*		
3. Dispersal efficiency: How efficient is the species' dispersal mechanism at key life stages?	Very good	1
	Good	2
	Medium	3
	Poor	**4**
	Uncertain	5
There are biological, social and anthropogenic constraints to dispersal in lions, and based on these cumulatively, lions can be classified as poor dispersers, although some long distance dispersal of males does occur. Male cubs are excluded from their maternal pride when they reach maturity at approximately three to four years of age, most of which then form coalitions with other males (Pusey & Packer 1987; Packer & Pusey 1993). Dispersing males face several challenges, for example dispersing into a high risk environment within which they have to hunt for themselves, and often obtain injuries as a result. Most young lionesses attempt to remain in the pride into which they were born, and those that do not remain typically do not disperse far and attempt to establish a territory adjacent to their natal territory. Lions dispersing out of protected areas are invariably killed, contributing further		

to the poor dispersal ability of lions in the South African context.

4. Interaction with humans: Is the species tolerant to human activity other than harvest?	No interaction	1
	Pest / Commensal	2
	Tolerant	3
	Sensitive	**4**
	Uncertain	5

In South Africa lions are conservation dependent, occurring solely in protected areas and on game farms, all of which are fenced. Across Africa, lion populations in fenced areas are significantly closer to their estimated carrying capacity than unfenced populations (Packer et al. *2013). Lions are sensitive to human modified landscapes.*

National status

5. National distribution: How is the species distributed nationally?	Widespread, contiguous in country	1
	Widespread, fragmented in country	2
	Restricted and fragmented	**3**
	Localized	4
	Uncertain	5

At present the lion distribution within South Africa is restricted and fragmented (Figure 3). Any change in the current distribution will be dependent on the establishment of new protected areas into which lions can be re-introduced. Lions originally roamed freely across most of South Africa but as a result of changes in land use (mostly for farming), free roaming lions were mostly extirpated from farmland and restricted to large national parks by the middle of the 20th century. The subsequent expansion of game reserves, especially since the early 1990s, has resulted in an increased range for lion and wild lions currently occur in isolated areas in all provinces of South Africa, except for the Free State. The estimated land area where lion occur is 41 745 km², with the largest proportion comprising a few large national or provincial protected areas (33 200 km², ca. 80%), and with the remainder made up of 45 small private or state reserves (Figure 3) with a combined area of ca. 8500 km² (Miller et al. *2016b).*

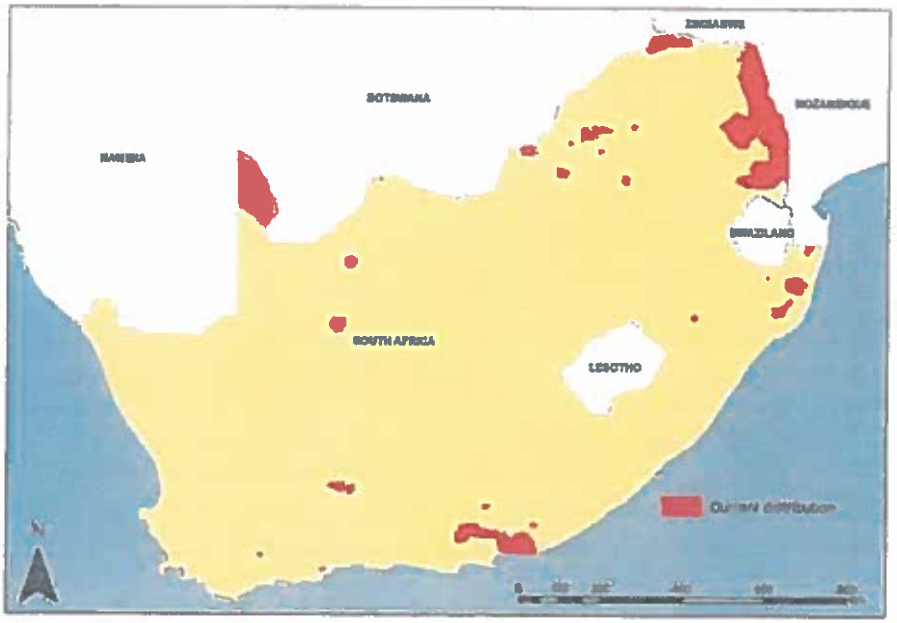

Figure 3: *The current distribution of lions in South Africa including both original and re-introduced populations.*

6. National abundance: What is the abundance nationally?	Very abundant	1
	Common	2
	Uncommon	**3**
	Rare	4
	Uncertain	5

Wild and re-introduced lions in South Africa are estimated to total about 3490 individuals (Table 1), including those in transfrontier zones (Miller et al. *2016b). Altogether about 2376 lions (83% of the total South African population) are well protected within South Africa's national parks (Miller* et al. *2016b). The total formally protected mature population of lions (1286) in South Africa represent 3–6% of the global mature population of 23 000–39 000 lions (Bauer* et al. *2015; Riggio* et al. *2013). The largest areas in the country with lion are the Kruger National Park, which straddles the provinces of Limpopo and Mpumalanga (part of the Greater Limpopo Transfrontier Park), and the Kalahari Gemsbok National Park in the Northern Cape (part of Kgalagadi Transfrontier Park). The Greater Limpopo Transfrontier Park subpopulation is estimated at c. 2000 individuals (South Africa only) if the private conservancies open to Kruger National Park on the western boundary are included (300 lions) and represents 70% of the wild lion population in South Africa.*

During 2010, 500 lion were estimated to occur in the Kgalagadi Transfrontier Park (Ferreira et al. *2013). Recent mark-recapture estimates for the South African side of Kgalagadi Transfrontier Park may indicate an increasing subpopulation, where the total number of individuals is estimated to be 246 (95% confidence intervals 238-256), and the number of mature individuals (excluding cubs) is estimated to be 167 (95% confidence intervals 160-177) (Miller* et al. *2016b). Fourteen lion occur in the Greater Addo Elephant National Park (2011) (Eastern Cape), 8 in the Karoo National Park (2011) (Western Cape), 13 in the Marakele National Park (2011) (Limpopo) and 120 in Hluluwe-iMfolozi Park (KwaZulu-Natal).*

Reintroduction of lion into small reserves (including national parks, provincial protected areas, conservancies and private reserves of <1000 km² in area) started in the early 1990s and there are currently about 500 lions on 45 small reserves (Miller et al. 2013; Miller & Funston 2014). All small reserve subpopulations are ecologically functional as, for example, they are large enough for social dynamics to continue unhindered, although some reserves may import prey stocks (Power 2002, 2003; Hayward et al. *2007).*

***Table 1:** Current numbers of wild lion in South Africa and surrounding transfrontier areas. All counts were made between 2008 and 2015 (Miller* et al. *2016b).*

Location (sub-location)	Total lions (SA only)	Number mature lions (SA only)
Greater Limpopo TP (Kruger NP)	*2000 (c. 1700)*	*1060 (c. 900)*
Associated Private Nature Reserves (Greater Kruger NP)	*300*	*160*
Kgalagadi TP	*520 (246)*	*255 (167)*
Greater Mapungubwe TFCA	*~50 (10)*	*25 (5)*
Hluhluwe-iMfolozi Park	*120*	*54*
Total excl. small reserves	***2990 (2376)***	***1554 (1286)***
Small reserves	*500*	*225*
Total incl. small reserves	***3490 (2876)***	***1779 (1511)***

According to a study initiated in 2008 by the Department of Environmental Affairs (DEA) and conducted by the University of Free State, an estimated 3596 lions were kept in 174 breeding facilities in South Africa during 2008 (Taljaard 2009). It is estimated that at present between 3600 and 6000

lions are kept in at least 174 breeding/captive facilities in South Africa (Williams et al. 2015). According to recent data (2017) provided by DEA, this number is likely to be closer to 7 000 individuals kept in approximately 260 facilities.

7. National population trend: What is the recent national population trend?	Increasing	1
	Stable	2
	Reduced, but stable	3
	Reduced and still decreasing	4
	Uncertain	5

When considering only the wild and re-introduced subpopulations in recent decades, lion numbers have increased and have probably been stable for the last thirty years in the two large wild subpopulations (Miller et al. 2016b). Recent surveys using 240 call-up stations distributed randomly throughout the Kruger National Park indicated the subpopulation has increased over the period 2000-2015 from 1684 (95% confidence intervals 1617-1751) to 1763 (95% confidence intervals 1680-1846) individuals and for adult females specifically, from 415 (95% confidence intervals 380-450) to 589 (95% confidence intervals 560-618) (Miller et al. 2016b). The lion population in the Kgalagadi Transfrontier Park has been fairly stable since the first population estimate in 1976 of 140 lion (range 108-181). In 1996/7 the population was estimated at 131 (range 106 – 156), and between 1998 and 2001 at 120 individuals (range 113-131). In 2010, 500 lion were estimated to occur in the Kgalagadi Transfrontier Park (Ferreira et al. 2013). Recent mark-recapture estimates for the South African side of Kgalagadi Transfrontier Park may indicate an increasing subpopulation, where the total number of individuals is estimated to be 246 (95% confidence intervals 238-256), and the number of mature individuals (excluding cubs) is estimated to be 167 (95% confidence intervals 160-177) (S. Ferreira unpubl. data). Since 2004 the number of lion on state-owned protected areas in KwaZulu-Natal has increased from 82 to 234, while the number of lion on private and communal land has increased from 33 to 82 during this same time period. Overall this represents an almost three-fold increase in the size of the lion population in the province, from 115 to 316, over a 7 year period (2004-2010). The remaining national parks have small numbers of lion that are intensively managed to maintain a single pride with 2-6 adult females. Lions also re-colonized the Mapungubwe National Park in about 2000, but fewer than 10 lions occur there.

8. Quality of information: What type of information is available to describe abundance and trend in the national population?	**Quantitative data, recent**	1
	Good local knowledge	2
	Quantitative data, outdated	3
	Anecdotal information	4
	None	5

Surveys in the Kruger National Park, and the Kgalagadi National Park are conducted regularly, which represent 68% of the total wild and managed population in South Africa. In the Kruger National Park, three park-wide surveys have been undertaken to date. In addition a 7-year study on the lions in Kruger National Park was recently completed. The lions within Hluhluwe iMfolozi Park are also monitored on a regular basis.

9. Major threats: What major threat is the species facing (underline following: overuse/ habitat loss and alteration/ invasive species/ other: disease; human wildlife conflict) and how severe is it?	**None**	1
	Limited/Reversible	2
	Substantial	3
	Severe/Irreversible	4
	Uncertain	5

At present there are no major threats to the wild and managed lion populations within South Africa. Minor threats include overutilization, disease, poaching and conflict with communities around protected areas. Most lions currently in captivity originate from captive-bred stock and are utilised by the trophy hunting industry and, since 2008, the lion bone trade as well. In terms of the Threatened or Protected Species (TOPS) Regulations (2007), wild lions may not be introduced into captivity. This also does not seem necessary as lions breed well in captivity. Although captive lions are not considered to be of any conservation value to the wild lion population (Hunter et al. *2013), it is thought that they may serve as a buffer to potential threats to the wild population by being the primary source of hunting trophies and derived products (Lindsey* et al. *2012a) (e.g. bones). A study conducted by TRAFFIC in 2013-2014 showed that the lion bone trade between South Africa and East-Southeast Asia is not detrimental to the wild lion population, and the bone in trade is primarily a by-product derived from captive lion trophy hunts (Williams* et al. *2015), at least up until early 2016 when the USA stopped the import of lion trophies from South Africa due to the listing of* Panthera leo *as threatened on the Endangered Species Act. The male lions are sold to trophy hunters, and the skeletons to East-Southeast Asia. The females are used for breeding stock and are eventually sold into the bone trade once they have ceased to breed (Williams* et al. *2015). Hunting of captive-bred lion differs from wild lion hunting in that lions are hunted in smaller areas (49.9 ± 8.4 km² compared to 843-5933 km² depending on the country), hunts are cheaper (US$20 000-40 000 compared to US$37 000-76 000), shorter (3.3 compared to 14-21 days), success rates are higher (99% compared to 51-96%), and trophy quality is higher (skull length + breath = 639 cm compared to 614-638 cm) (Lindsey* et al. *2012a).*

Harvest management

10. Illegal off-take or trade: How significant is the national problem of illegal or unmanaged off-take or trade?	None	1
	Small	**2**
	Medium	3
	Large	4
	Uncertain	5

Although there are no specific figures on the illegal trade of lions in South Africa, provincial conservation authorities indicated that illegal use or trade of wild lion is generally small to negligible. There is no recorded/known illegal trade in wild lion in Gauteng, KwaZulu-Natal or the Eastern Cape and illegal utilization of lion within South Africa's national parks is negligible. There are currently no statistics relating to cases involving lion in the National Environmental Compliance and Enforcement Report, although there are cases currently under investigation. Illegal trade in captive-bred lions within North West Province is suspected to take place, as this industry is large and a challenge to regulate. Lions along the Kgalagadi Tranfrontier Park boundaries have been persecuted for decades (Mills et al. *1978; Van Vuuren, Herrmann & Funston 2005; Funston 2011).*

11. Management history: What is the history of harvest?	Managed harvest: on-going with adaptive framework	1
	Managed harvest: on-going but informal	**2**
	Managed harvest: new	3
	Unmanaged harvest: on-going or new	4
	Uncertain	5

Lions are actively managed in most areas within South Africa. As part of a comprehensive management approach for lion, the Department of Environmental Affairs has developed a Biodiversity Management Plan (BMP) for lion in terms of the National Environmental Management: Biodiversity Act, 2004 (NEMBA 2004), which was published for implementation in December 2015.

Apart from the management of damage causing animals, the lion population within the Kgalagadi Transfrontier Park has never been managed (Mills et al. *1978; Van Vuuren, Herrmann & Funston 2005; Funston 2011). The lions that were established in the Hluhluwe-iMfolozi Park have been managed quite intensively, mainly to minimize conflict along the park boundary (Anderson 1980) and more recently to improve their genetic diversity and thereby reproductive potential (Trinkel 2008). Additional key management actions in KwaZulu-Natal for 2011 and 2012 included the determination of a provincial conservation target for lion, and the continuation with surveillance and monitoring of the provincial lion population and illegal hunting incidents. Utilisation and keeping of lion in the wild is closely managed in the province of Gauteng due to the dense human population in the province. Off-takes of lion (translocation and culling) within South African National Parks are associated with ecological management interventions and guided by a robust science framework.*

In all the larger parks in South Africa, lions occasionally venture out of the park and kill livestock. In the Kruger National Park and Hluhluwe-iMfolozi (Anderson 1980) these lions are generally shot by rangers, whereas in the Kgalagadi rangers try and translocate them back into the park (Mills et al. *1978; Funston 2002). The reintroduction of lions into some 45 smaller fenced game reserves in South Africa has largely been for eco-tourism purposes rather than ecological reasons (Slotow & Hunter 2009). Reintroduced lions are currently micromanaged (Hayward* et al. *2007a,b,c; Hunter et al. 2007; Kettles & Slotow 2009) primarily in isolation from each other, the net effect of which reduces their conservation value on a regional scale (Slotow & Hunter 2009). Ferreira & Hofmeyr (2014) advocate an approach where managers of small areas mimic natural social dynamics such as coalition tenure, density dependent changes in litter size, age at first birth and birth intervals, as well as sub-adult dispersal. This assists with achievement of population and evolutionary targets through a process-based approach mimicking drivers of variance in social groups. It is further suggested that these small populations be managed on a regional level as a single population with social groups spatially isolated over the region (Ferreira & Hofmyer 2014).*

12. Management plan or equivalent: Is there a management plan related to the harvest of the species?	**Approved and co-ordinated local and national management plans**	1
	Approved national/state/provincial management plan(s)	2
	Approved local management plan	3
	No approved plan: informal unplanned management	4
	Uncertain	5

*A Biodiversity Management Plan for the African Lion (*Panthera leo*), which includes a meta-population management plan and several actions to assess and improve the management of captive lions (such as the development of national standards for the keeping and captive breeding of lions and an audit of all lion keeping facilities), was published for implementation in December 2015 (Government Gazette vol. 606 no. 39468). Lions are protected under various provincial Ordinances / Acts, and provincial conservation authorities often require ecological management plans when lion is re-introduced to a property. There are also local, informal management plans and approved local management plans for specific reserves that specify the type of lion that may be hunted, typically male lions above six years of age (Miller* et al. *2016a).*

13. Aim of harvest regime in management planning: What is harvest aiming to achieve?	Generate conservation benefit	1
	Population management/control	**2**
	Maximize economic yield	3
	Opportunistic, unselective harvest, or none	4
	Uncertain	5
Only wild and managed populations were considered in the scoring of this question since trophy lions are predominantly sourced from captive-bred populations (Sinovas et al. *2016) with less than 5% of lion hunts conducted on private property between 2008 and 2010 having targeted wild lions. Consumptive use of lion for commercial purposes is mostly restricted to private game reserves. Private landowners that conduct legal hunts of wild lions have an interest in ensuring the stability of their lion populations. In addition to the limited trophy hunting of wild lion, other kinds of harvesting are undertaken as a management tool to regulate populations, such as culling and live removals. These harvests aim to mimic population dynamics that are absent in managed prides (Ferreira & Hofmeyr 2014; Miller* et al. *2015).*		
14. Quotas: Is the harvest based on a system of quotas?	On-going national quota: based on biologically derived local quotas	1
	On-going quotas: "cautious" national or local	**2**
	Untried quota: recent and based on biologically derived local quotas	3
	Market-driven quota(s), arbitrary quota(s), or no quotas	4
	Uncertain	5
Current harvest is not based on a national quota system. Harvest is however managed on a local scale with ecologically based local quotas. Permits for wild lion hunts in South Africa are issued by the relevant provincial conservation authority, as are permits for hunting captive-bred lions. Off-takes of lion within South African National Parks are guided by a strict utilization strategy.		
Control of harvest		
15. Harvesting in Protected Areas: What percentage of the legal national harvest occurs in State-controlled Protected Areas?	High	1
	Medium	2
	Low	**3**
	None	4
	Uncertain	5
Hunting of lion is not allowed in national parks, which collectively represents the majority of the wild population (>80% of the total lion population), but there is limited legal hunting in some provincial state protected areas. In KwaZulu-Natal damage-causing animals can be hunted by local hunters on the borders of protected areas. The number of damage causing lions removed annually in the Kruger National Park is relatively low (<1% of the population). In smaller reserves this off-take is slightly higher at 10-20%. Removals of lion from the Kgalagadi Transfrontier Park are much higher.		
16. Harvesting in areas with strong resource tenure or ownership: What percentage of the legal national harvest occurs outside Protected Areas, in areas with strong local control over resource use?	**High**	**1**
	Medium	2
	Low	3
	None	4
	Uncertain	5
Utilization of lion for commercial purposes is mostly restricted to private game reserves. Trophy hunting of lions is popular in South Africa, although trophies are predominantly sourced from captive-		

bred populations (Sinovas et al. 2016). Hunting of wild lion on private property is limited, with less than 5% of lion hunts conducted over the 2008 to 2010 reporting period having targeted wild lions. Wild lions are hunted in the Associated Private Nature Reserves (APNR) bordering the Kruger National Park and open to the park. The APNR has a very strict hunting protocol that is strictly enforced. There is also a general memorandum of understanding between the Kruger National Park and the APNR. Aspects with regards to trophy hunts are handled on a case by case basis.

17. Harvesting in areas with open access: What percentage of the legal national harvest occurs in areas where there is no strong local control, giving *de facto* or actual open access?	**None**	**1**
	Low	2
	Medium	3
	High	4
	Uncertain	5

No lions occur within open access areas. Damage causing animals within these areas originate from protected areas and the number of animals removed on average is low.

18. Confidence in harvest management: Do budgetary and other factors allow effective implementation of management plan(s) and harvest controls?	High confidence	1
	Medium confidence	2
	Low confidence	3
	No confidence	4
	Uncertain	**5**

Local level management plans and harvest controls are effectively implemented. On a national scale however there is no budget or capacity to fund a national coordinated system that can be implemented for all re-introduced lion populations. Thus budget and legal restrictions are hampering the scaling up of local management to enhance a larger management framework for lion conservation. The biodiversity management plan for lion, that includes a meta-population management plan, has only recently (December 2015) been published for implementation. Confidence in the effective implementation of this management plan is thus still uncertain.

Monitoring of harvest

19. Methods used to monitor the harvest: What is the principal method used to monitor the effects of the harvest?	Direct population estimates	1
	Quantitative indices	**2**
	Qualitative indices	3
	National monitoring of exports	4
	No monitoring or uncertain	5

Lion is currently listed as vulnerable in terms of the National Environmental Management: Biodiversity Act (Act No. 10 of 2004) (NEMBA), meaning that a permit is required if a person intends to carry out any restricted activity involving lion such as keeping, hunting, catching, breeding, selling, conveying or exporting from the country. The permit system is regulated through the Threatened or Protected Species (TOPS) Regulations (2007), which have been promulgated in terms of NEMBA. Lion is also protected under various provincial Ordinances / Acts. Within the Free State, Limpopo and Northern Cape, all lion hunts are attended by a provincial officer, while Mpumalanga's legislation does not require a conservation official to be present at lion hunts. Due to capacity constraints within KwaZulu-Natal, North West and the Eastern Cape, only some of the lion hunts are attended by a conservation officer. Lion hunts are not offered in Gauteng and the Western Cape. Data obtained from the provinces are used to calculate statistics on the trends in lion populations within the provinces and nationally. Any negative consequences of the harvest of lion will thus be detectable through the current permit monitoring system.

According to the CITES trade database that is administered by UNEP-WCMC, just over half (53%) of the lion (3508) exported from South Africa between 2000 and 2009 are wild sourced, but this is due to a reporting error. Lions bred in captivity, then released in extensive systems for a period of time before being hunted have in the past been incorrectly reported as source code "W" (i.e. wild). Delegated provincial management authorities have subsequently been requested to ensure the correct use of source codes so that the CITES trade records correctly reflect the trade in wild specimens. There is also a major discrepancy between reported exports and reported imports, with reported exports of captive sourced specimens greater than reported imports and conversely the reported exports of wild sourced specimens less than the reported imports. This would have contributed to inflated export figures overall and of wild sourced specimens in particular.

20. Confidence in harvest monitoring: Do budgetary and other factors allow effective harvest monitoring?	**High confidence**	**1**
	Medium confidence	2
	Low confidence	3
	No confidence	4
	Uncertain	5

There is a high confidence in the quantitative indices used to monitor the harvest of wild lions. Most reserves monitor their lion populations well and are well-resourced on a local level.

Incentives and benefits from harvesting

21. Utilization compared to other threats: What is the effect of the harvest when taken together with the major threat that has been identified for this species?	Beneficial	1
	Neutral	**2**
	Harmful	3
	Highly negative	4
	Uncertain	5

There is currently no major threat facing wild lions within South Africa. Trophy hunting of wild lions is limited, with the number of wild lion hunted over the period 1999-2008 never exceeding 10 lion per annum. Trophy lions are predominantly sourced from captive-bred populations. Harvesting as a tool for science-based population management of fragmented populations is beneficial to the population.

22. Incentives for species conservation: At the national level, how much conservation benefit to this species accrues from harvesting?	High	1
	Medium	2
	Low	**3**
	None	4
	Uncertain	5

Currently wild lion hunts are less than 10 per year and the majority of income originates from non-consumptive tourism. However, where lion trophy hunting occurs (e.g. APNR) it contributes directly to the conservation of the species. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat. However, in some cases benefits do not filter down to directly affected stakeholders and thereby affect conservation outcomes. Ecological harvesting of lions is practiced in some managed populations in order to mimic population dynamics that are absent (Ferreira & Hofmeyr 2014). These removals benefit the conservation of the species.

23. Incentives for habitat conservation: At the national level, how much habitat conservation benefit is derived from harvesting?	High	1
	Medium	2
	Low	**3**
	None	4
	Uncertain	5
Hunting of wild lion on private property is limited, with less than 5% of lion hunts conducted over the 2008 to 2010 reporting period having targeted wild lions. The revenue generated through hunting contributes to the maintenance of areas where these lion populations can continue to exist. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat.		
Protection from harvest		
24. Proportion strictly protected: What percentage of the species' natural range or population is legally excluded from harvest?	**>15%**	**1**
	5-15%	2
	<5%	3
	None	4
	Uncertain	5
Hunting of lion is not allowed in any of the national parks and only limited trophy hunting is allowed on some provincial state reserves, this collectively representing the majority of the wild population (>80% of the total lion population). The scoring is based on the population size and not on the range of the species.		
25. Effectiveness of strict protection measures: Do budgetary and other factors give confidence in the effectiveness of measures taken to afford strict protection?	High confidence	1
	Medium confidence	**2**
	Low confidence	3
	No confidence	4
	Uncertain	5
The national and provincial permitting systems are effective.		
26. Regulation of harvest effort: How effective are any restrictions on harvesting (such as age or size, season or equipment) for preventing overuse?	Very effective	1
	Effective	**2**
	Ineffective	3
	None	4
	Uncertain	5
Regulation of harvest effort is effective. On a local scale specific individuals are selected for ecological harvesting, trophy hunting or removal of damage causing animals. Guidelines for the trophy hunting of wild lions in South Africa have been developed and form part of permit conditions within the provinces (Miller et al. *2016a).*		

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References:

Anderson, J.L. (1980). The re-establishment and management of a lion *Panthera leo* population in Zululand, South Africa. *Biological Conservation* 19: 107-117.

Bauer, H., Packer, C., Funston, P.F., Henschel, P., and Nowell, K. (2015). Panthera leo. The IUCN Red List of Threatened Species 2015.

Creel, S. & Creel, N.M. (1997). Lion density and population structure in the Selous Game Reserve: Evaluation of hunting quotas and offtake. *African Journal of Ecology* 35: 83–93.

De Boer, W.F., Vis, M.J.P, De Knegt, H. J., Rowles, C., Kohi, E. M., et al. (2010). Spatial distribution of lion kills determined by the water dependency of prey species. *Journal of Mammalogy* 91: 1280–1286.

Druce, D., Genis, H., Braak, J., Greatwood, S., Delsink, A., Kettles, R., Hunter, L. & Slotow, R. (2004a). Prey selection by a reintroduced lion population in the Greater Makalali Conservancy, South Africa. *African Zoology* 39: 273-284.

Druce, D., Genis, H., Braak, J., Greatwood, S., Delsink, A., Kettles, R., Hunter, L. & Slotow, R. (2004b). Population demography and spatial ecology of a reintroduced lion population in the Greater Makalali Conservancy, South Africa. *Koedoe* 47: 103–118.

Elliot, J.P. & Cowan, I. Mc T. (1978). Territoriality, density and prey of the lion in Ngorongoro Crater, Tanzania. *Canadian Journal of Zoology* 56: 1726-1734.

Ferreira, S.M. & Funston, P.J. (2010a). Estimating lion population variables: Prey and disease effects in Kruger National Park, South Africa. *Wildlife Research* 37: 194-206.

Ferreira, S.M. & Funston, P.J. (2010b). Age assignment to individual African lions. *South African Journal of Wildlife Research* 40: 1-9.

Ferreira, S.M., Govender, D., & Herbst, M. (2013). Conservation implications of Kalahari lion population dynamics. *African Journal of Ecology* 51:176–179.

Ferreira, S.M. & Hofmeyr, M. (2014). Managing charismatic carnivores in small areas: large felids in South Africa. *South African Journal of Wildlife Research* 44(1): 32-42.

Funston, P.J. (2002). Kgalagadi Transfrontier Lion Project – Final Report. Submitted to the Green Trust and the Endangered Wildlife Trust.

Funston, P.J. (2004). Specialist study: Lion utilization plan for the Associated Private Nature Reserves (APNR). Management Consultancy.

Funston, P.J. & Mills, M.G.L. (2006). The influence of lion predation on the population dynamics of common large ungulates in the Kruger National Park. *South African Journal of Wildlife Research* 36: 9-22.

Funston, P.J. (2008). Conservation and management of lions in Southern Africa: Status, threats, utilization and the restoration option. In: B. Croes, H.H. Delongh, & H. Bauer (Eds.), Management and Conservation of Large Carnivores in West and Central Africa. (pp. 109-131). Institute of Environmental Sciences, Leiden.

Funston, P.J. (2011). Population characteristics of lions (Panthera leo) in the Kgalagadi Transfrontier Park. *South African Journal of Wildlife Research* 41: 1-12.

Funston, P.J., Mills, M.G.L., Biggs, H.C. & Richardson, P.R.K. (1998). Hunting by male lions: ecological influences and socioecological implications. *Animal Behavior* 56: 1333–1345.

Funston, P. J., Mills, M. G. L. & Biggs, H. C. (2001). Factors affecting the hunting success of male and female lions in the Kruger National Park. *Journal of Zoology, London* 253: 419–431.

Funston, P.J., Mills, M.G.L., Richardson, P.R.K. & van Jaarsveld, A.S. (2003). Reduced dispersal and opportunistic territory acquisition in male lions *(Panthera leo)*. *Journal of Zoology, London* 259: 1-12.

Funston, P.J., Groom, R.J. & Lindsey, P.A. (2013). Insights into the management of large carnivores for profitable wildlife-based land uses in African savannas. *PLoS ONE* 8(3): e59044. doi:10.1371/journal.pone.0059044

Hanby, J. & Bygott, J. (1987). Emigration of subadult lions. *Animal Behavior* 35: 161–169.

Hanby, J.P., Bygott, J. & Packer, C. (1995). Ecology, demography, and behavior of lions in two contrasting habitats: Ngorongoro Crater and the Serengeti plains. In: Sinclair, A. R. E. and Arcese, P. (eds), Serengeti II: dynamics, management, and conservation of an ecosystem. Univ. of Chicago Press, pp. 315-331.

Hayward, M.W. & Kerley, G.I.H. (2005). Prey preferences of the lion (*Panthera leo*). *Journal of Zoology, London* 267: 309–322.

Hayward, M.W. & Hayward, G.J. (2007). Activity patterns of reintroduced lion Panthera leo and spotted hyaena *Crocuta crocuta* in Addo Elephant National Park, South Africa. *African Journal of Ecology* 45: 135–141.

Hayward, M., O'Brien, J. & Kerley, G. (2007a). Carrying capacity of large African predators: Predictions and tests. *Biological Conservation* 139: 219-229.

Hayward, M.W., Adendorff, J., O'Brien, J., Sholto-Douglas, A., Bissett, C., et al. (2007b). Practical considerations for the reintroduction of large, terrestrial, mammalian predators based on reintroductions to South Africa's Eastern Cape Province. *Open Conservation Biology Journal* 11:1-11.

Hayward, M.W., Adendorff, J., O'Brien, J., Sholto-Douglas, A., Bissett, C., et al. (2007c). The reintroduction of large carnivores to the Eastern Cape, South Africa: an assessment. *Oryx* 41: 205-214.

Hayward, M.W & Kerley, G.I.H (2009a). Fencing for conservation: Restriction of evolutionary potential or a riposte to threatening processes? *Biological Conservation*. 142: 1-13.

Hayward, M.W, Hayward, G.J., Druce, D.J. & Kerley, G.I.H. (2009b). Do fences constrain predator movements on an evolutionary scale? Home range, food intake and movement patterns of large predators reintroduced to Addo Elephant National Park, South Africa. *Biodiversity and Conservation* 18: 887–904.

Hayward, M.W., Hayward, G.I, Tambling, C.J. & Kerley, G.I.H. (2011). Do lions Panthera leo actively select prey or do prey preferences simply reflect chance responses via evolutionary adaptations to optimal foraging? *PLoS ONE* 6(9): e23607. doi:10.1371/journal.pone.0023607.

Hopcraft, J. G. C., Sinclair, A. R. E. & Packer, C. (2005). Planning for success: Serengeti lions seek prey accessibility rather than abundance. *Journal of Animal Ecology* 74: 559–566.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Rickelton, M., Walker, C., Slotow, R. & Skinner, J. D. (2007). Restoring lions *Panthera leo* to northern KwaZulu-Natal, South Africa: short-term biological and technical success but equivocal long-term conservation. *Oryx* 41: 196-204.

Hunter, L.T., White, P., Henschel, P., Frank, L., Burton, C., Loveridge, A., Balme, G., Breitenmoser, C., and Breitenmoser, U. (2013). Walking with lions: why there is no role for captive-origin lions Panthera leo in species restoration. *Oryx* 47:19-24.

Kettles, R. & Slotow, R. (2009). Management of free-ranging lions on an enclosed game reserve. *South African Journal of Wildlife Research* 39: 23-33.

Lindsey, P.A., Alexander, R., Balme, G., Midlane, N. & Craig, J. (2012a). Possible relationships between the South African captive-bred lion hunting industry and the hunting and conservation of lions elsewhere in Africa. *South African Journal of Wildlife Research* 42: 11–22.

Lindsey, P.A., Balme, G.A., Booth, V.R. & Midlane, N. (2012b). The significance of African lions for the financial viability of trophy hunting and the maintenance of wild land. *PLoS One* 7(1): e29332.

Lindsey, P.A, Havemann, C.P., Lines, R.M., Price, A.E., Retief, T.A., Rhebergen, T., Van der Waal, T. & Romañach, S.T. (2013). Benefits of wildlife-based land uses on private lands in Namibia and limitations affecting their development. *Oryx* 47: 41–53.

Lindsey, P.A, Balme, G.A., Funston, P.J., Henschel, P., Hunter, L., Madzikanda, H., Midlane, N. & Nyirenda, V. (2013). The trophy hunting of African lions: scale, current practices and factors undermining sustainability. *PLoS One* 9(8), e73808.

Miller, J.R.B., Balme, G., Lindsey, P.A., Loveridge, A.J., Becker, M.S., Begg, C., Brink, H., Dolrenry, S., Hunt, J.E. , Jansson, I. (2016a). Aging traits and sustainable trophy hunting of African lions. *Biological Conservation* 201, 160.

Miller, S.M., Riggio, J., Funston, P., Power, J., Williams, V., and Child, M. (2016b). A Conservation Assessment of *Panthera leo*. In: M.F. Child, L. Roxburgh, D. Raimondo, E. Do Linh San, J. Selier and H. Davies-Mostert (eds), *The Red List of Mammals of South Africa, Swaziland and Lesotho*. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

Miller, S.M, Bissett, C., Burger, A., Courtney, B. & Dickerson, T. (2013). Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and best practice guidelines. *South African Journal of Wildlife Research* 43: 138-154.

Miller, S.M. & Funston, P.J. (2014). Population growth rates of lions (*Panthera leo*) on small, fenced reserves in South Africa: a management dilemma. *South African Journal of Wildlife Research* 44: 43-55.

Mills, M.G.L., Wolf, P., Le Riche, E.A.N. & Meyer, I.J. (1978). Some population characteristics of the lion (*Panthera leo*) in the Kalahari National Park. *Koedoe* 21: 163–171.

Mills, M.G.L. & Shenk, T.M. (1992). Predator-prey relationships: the impact of lion predation on wildebeest and zebra populations. *Journal of Animal Ecology* 61: 693-702.

Mills, M. G. L. & Biggs, H. C. (1993). Prey apportionment and related ecological relationships between large carnivores in Kruger National Park. Symposium of the Zoological Society of London 65: 256–268.

Mills, M.G.L., Biggs, H.C. & Whyte, I.J. (1995). The relationship between rainfall lion predation and population trends in African herbivores. *Wildlife Research* 22: 75-88.

Mosser, A. & Packer, C. (2009). Group territoriality and the benefits of sociality in the African lion, Panthera leo. *Animal Behaviour* 78: 359–370.

Owen-Smith, N. (2008). Changing vulnerability to predation related to season and sex in an African ungulate assemblage. *Oikos* 117: 602-610.

Owen-Smith, N. & Mills, M.G.L. (2008a). Predator-prey size relationships in an African large-mammal food web. *Journal of Animal Ecology* 77: 173-183.

Owen-Smith, N. & Mills, M.G.L. (2008b). Shifting prey selection generates contrasting herbivore dynamics within a large-mammal predator–prey web. Ecology 89: 1120–1133.

Packer, C. & Pusey, A. E. (1993). Dispersal, kinship, and inbreeding in African lions. In: N. Thornhill (Ed.), Natural History of Inbreeding and Outbreeding: Theoretical and Empirical Perspectives. (pp. 375-391). University of Chicago Press, Chicago.

Packer, C. & Pusey, A.E. (1987). Intrasexual cooperation and the sex ratio in African lions. *American Naturalist* 130: 636–642.

Packer, C., Herbst, L., Pusey, A. E., Bygott, J. D., Hanby, J. P., Cairns, S. J. & Borgerhoff-Mulder, M. (1988). Reproductive success in lions. In: Reproductive Success (Ed. by T. H. Clutton-Brock), pp. 363–383. Chicago: University of Chicago Press.

Packer, C., Scheel, D. & Pusey, A. E. (1990). Why lions from groups: food is not enough. *American Naturalist* 136: 1–19.

Packer, C., Pusey, A.E., Rowley, H., Gilbert, D.A., Martenson, J. & O'Brian, S.J. (1991). Case study of a population bottleneck: lions of the Ngorongoro crater. *Conservation Biology* 5: 219–230.

Packer, C., Gilbert, A., Pusey, A.E. & O'Brien, S. J. (1991). A molecular genetic analysis of kinship and cooperation in African lions. *Nature* 351: 562–565.

Packer, C., Pusey, A.E. & Eberly, L. E. (2001). Egalitarianism in female African lions. *Science* 293: 690–693.

Packer, C., Altizer, S., Appel, M., Brown, E., Martenson, J., O'Brien, S.J., et al. (1999). Viruses of the Serengeti: patterns of infection and mortality in African lions. *Journal of Animal Ecology* 68: 1161-1178.

Packer, C., Pusey, A.E., & Eberly, L.E. (2001). Egalitarianism in female African lions. *Science* 293: 690-693.

Packer, C., Hilborn, R., Mosser, A., Kissui, B., Borner, M., Hopcraft, G., Wilmshurst, J., Mduma, S. & Sinclair, A.R.E. (2005). Ecological change, group territoriality, and population dynamics in Serengeti lions. *Science* 307: 390–393.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., et al. (2009). Sport hunting, predator control and conservation of large carnivores. *Plos ONE* 4: e5491.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., & Caro, T. (2011). Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology* 25: 142-153.

Packer, C., S. Canney, A. Loveridge, S.T. Garnett, M. Pfeifer, K.K. Zander, A. Swanson, D. MacNulty, G. Balme, P.J. Funston et al. (2013). Conserving Large Carnivores: Dollars and Fence. *Ecology Letters* doi: 10.1111/ele.12091

Power RJ. (2002). Prey selection of lions *Panthera leo* in a small, enclosed reserve. *Koedoe* 45:67–75.

Power RJ. (2003). Evaluating how many lions a small reserve can sustain. *South African Journal of Wildlife Research* 33:3–11.

Pusey, A. E. & Packer, C. (1987). Evolution of sex-biased dispersal in lions. *Behaviour* 101: 275–309.

Radloff, F.G.T. & du Toit J.T. (2004). Large predators and their prey in a southern African savanna: a predator's size determines its prey size range. *Journal of Animal Ecology* 73: 410-423.

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., Funston, P., Groom, R., Henschel, P., and de Iongh, H. (2013). The size of savannah Africa: a lion's (Panthera leo) view. *Biodiversity and Conservation* 22:17-35.

Schaller, G.B. (1972). The Serengeti Lion: A Study of Predator Prey Relations. University of Chicago Press, Chicago.

Sinovas, P., Price, B., King, E., Davis, F., Hinsley, Pavitt, A., and Pfab, M. 2016. Southern Africa's wildlife trade: an analysis of CITES trade in SADC countries. Technical report prepared for the South African National Biodiversity Institute (SANBI). UNEP-WCMC, Cambridge, UK.

Slotow, R. & Hunter, L.T.B. **(2009).** Reintroduction decisions taken at the incorrect social scale devalue their conservation contribution: the African lion in South Africa. In: M.W. Hayward & M.J. Somers (Eds.), Reintroduction of Top-Order Predators. (pp. 41-73). Wiley-Blackwell, Oxford.

Smuts, G.L. (1978b). Effects of population reduction on the travels and reproduction of lions in Kruger National Park. *Carnivore* 1: 61-72.

Spong, G. & Creel, S. (2001). Deriving dispersal distances from genetic data. *Proceedings of the Royal Society of London* 268: 2571-2574.

Stander, P.E. **(1990).** A suggested management strategy for stock-raiding lions in Namibia. *South African Journal of Wildlife Research* 20: 53–60.

Stander, P. E. (1991). Demography of lions in the Etosha National Park, Namibia. *Madoqua* 18: 1-9.

Taljaard, P.R. **(2009).** Report on the captive lion breeding industry in South Africa. Unit for Livestock and Wildlife Economics Department of Agricultural Economics, University of the Free State, Bloemfontein.

Trinkel, M., Ferguson, N., Reid, A, Reid, C., Somers, M., et al. (2008). Translocating lions into an inbred lion population in the Hluhluwe-iMfolozi Park, South Africa. *Animal Conservation* 11: 138-143.

Valeix, M., Loveridge, A.J., Davidson, Z., Madzikanda, H., Fritz, H. & Macdonald, D.W. (2010). How key habitat features influence large terrestrial carnivore movements: waterholes and African lions in a semi-arid savanna of north-western Zimbabwe. *Landscape Ecology* 25:337–351.

Van der Waal, K.L., Mosser, A. & Packer, C. (2009). Optimal group size, dispersal decisions and postdispersal relationships in female African lions. *Animal Behaviour* 77: 949–954.

Van Orsdol, K.G., Hanby, J.P. & Bygott, J.D. (1985). Ecological correlates of lion social organization (*Panthera leo*). *Journal of Zoology, London* 206: 97-112.

Van Vuuren, J.H., Herrmann, E. & Funston, P.J. (2005). Lions in the Kgalagadi Transfrontier Park: modelling the effect of human-caused mortality. *International Transactions in Operational Research* 12: 145–171.

Williams, V.L., Newton, D.J., Loveridge, A.J., Macdonald, D.W. (2015). Bones of contention: an assessment of the South African trade in African Lion *Panthera leo* bones and other body parts. TRAFFIC, Cambridge, UK & WildCRU, Oxford, UK. Available from http://www.traffic.org/species-reports/traffic_species_mammals83.pdf.

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In Reply Refer To:
FWS/AIA/DMA/PRT-83426C

Enhancement Finding
Applicant: Kenneth Wayne Whitworth (PRT-83426C)

Kenneth Wayne Whitworth submitted an application on March 26, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Umbabat Private Nature Reserves, Associated Private Nature Reserves (APNR), Hoedspruit, South Africa for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of South Africa, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy to be taken between May 26, 2018, and June 24, 2018, from this wild-managed lion (*P. l. melanochaita*) population within South Africa **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes South Africa, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from South Africa, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in South Africa.

In evaluating the available data on lion hunting in South Africa, the Service understands that South Africa has three classifications for lions: wild, wild-managed, and captive-bred and classifies wild and wild-managed lions separately from captive-bred lions raised for hunting purposes since the management and oversight of these specimens is different within South Africa. Therefore, information relevant to the Service's consideration on whether to permit the import of a sport-hunted trophy from Umbabat Private Nature Reserves, a reserve which maintains a population of wild-managed lions, must be evaluated based on information pertaining to the management of wild and wild-managed lions in South Africa.

<u>General considerations:</u>

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in South Africa contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Whitworth's application involving a *P. l. melanochaita* sport-hunted trophy taken in Umbabat Private Nature Reserves, APNR, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita*

from Umbabt Private Nature Reserves. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All

necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Whitworth's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how South Africa's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also consider how a U.S. hunter's, in this case, Mr. Whitworth's, participation in the hunting program contributes to the overall management of lions within a country.

The management program in South Africa for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas;

management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On January 12, 2016, the Service sent a letter to South Africa's Department of Environmental Affairs (DEA) with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in South Africa, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our January 12, 2016, letter, the DEA provided four documents. In addition, the Service met with representatives of DEA during the 17th Meeting of the Parties to the Convention in Johannesburg in late September 2016. Further, since those meetings, there have been several written exchanges with DEA discussing the DEA's evaluation of reserves with lions and how these animals conform to DEA's lion management plan. The four document provided to the Service in January 2016, along with the Service's own final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DEA, comments received from interested parties, and Mr. Whitworth's application were the basis of this finding.

South Africa has defined three populations of lions that exist within the country through their Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP; December 2015): *Wild lions,* who completely fulfill their role in biodiversity processes and are largely unmanaged, and exist only in formally proclaimed national parks and game reserves. This population's vital rates and demographics are not actively manipulated; *Wild-managed lions,* which include all lions that have been re-introduced into smaller fenced reserves (<1000km^2), and are managed to limit population growth and maintain genetic diversity. Some of the vital rates and demographics of these lions are actively manipulated; and *Captive lions*, bred for financial gain, where all vital rates and demographics of these populations are actively manipulated.

***Governance of Lions in South Africa*:** The lion is listed as vulnerable in the South African list of Threatened and Protected Species (ToPS) under Section 56(1) of the National Environmental

Management Biodiversity Act, 2004 (Act no 10 of 2004; NEMBA; BMP pg. 1). NEMBA further regulates a permit system regarding restricted activities involving specimens of listed threatened or protected species (Act no 10 of 2004; Chapter 7). Regulated activities in need of registration include, among others, captive breeding facilities, sanctuaries, scientific institutions, game farms, wildlife traders, wildlife product traders, taxidermists, wildlife translocators, and freight agents (NEMBA pg. 25).

NEMBA gives effect to the Convention on Biological Diversity (CBD) [South Africa is a party to CBD] and Section 24 in the Bill of Rights of the Constitution of the Republic of South Africa (1996). Under Section 24(b): "everyone has the right to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development" (BMP pg. 15).

In addition to South Africa's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, South Africa provided a copy of their CITES non-detriment finding (NDF) for lions. Their finding, while focusing only on wild and wild-managed lions, applies to all lion exports from South Africa, including the captive lion population. This was clarified through personal communication with the South African Management Authority, where the Service was informed that the finding may be amended to better clarify that the finding applies to all lions within South Africa. Included in Mr. Whitworth's application is a copy of the DEA's most recent lion NDF, dated January 23, 2018, which includes information on wild, wild-managed, and captive-bred lions and continues to find that the export of the species will not be detrimental to the survival of the species in the wild.

South Africa is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

In 1991, South Africa legalized private ownership of wildlife, leading to a significant rise in game ranches and farms. In 2010, private lands with wildlife covered approximately 16.8% of South Africa, compared to national and provincial protected areas accounting for only 6% (Cousins *et al.* 2010). It has been stated that this expansion of private lands and the wildlife industry resulting from the private ownership of wildlife is responsible for significantly increasing South Africa's large mammal populations (Crowley and Mokhema 2014). According to Crowley and Mokhema (2014), South Africa's game ranching industry is worth $1.1 billion a year and is growing at 10 percent annually. Under the ToPS regulations, permits can be obtained to carry out activities that

may negatively impact the survival of a listed species, such as possession or hunting, provided the applicant meets specific criteria, such as having a biodiversity management plan for the species protected by ToPS. This permitting regime generates funds for national conservation efforts, while allowing landowners to profit from maintaining wildlife on their property. The landowners can then reinvest in the property by funding conservation efforts, managing wildlife, and carrying out anti-poaching efforts (Cousins *et al.* 2010).

Current Lion Status in South Africa: The lion was almost extirpated in South Africa by the early 1900s, remaining only in small numbers in what is now Kruger National Park (NP) and the Kgalagadi Transfrontier Park (TP). With the formation of Kruger NP in the 1920s, wild lion numbers slowly recovered, growing to the current population of approximately 1,700 lions (BMP, pg. 40). Kgalagadi TP has a stable, albeit smaller, population of approximately 400 lions, but is considered a lion stronghold in southern Africa. Lions recolonized Hluhluwe-iMfolozi Park (HiP) in the 1950/1960s and that population is currently stable at approximately 120 lions. Along with small groups of lions in Addo Elephant National Park, Karoo National Park, Marakele National Park, there are approximately 2,200 wild lions in South Africa. In addition, there are approximately 800 wild-managed lions separated among 45 fenced reserves of less than 1,000 square kilometers each (BMP pg. 40). It should be noted, however, that DEA is evaluating each of these fenced reserves to confirm that the lions maintained on the reserve can be classified as wild-managed. As such, the Service evaluated this application, in part, based on DEA's evaluation of the reserve where the lion was taken.

When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. These three threats led to the shrinking of lion populations and their range from pre-Colonial South Africa, to the current situation of lions being found predominantly on a limited number of national parks and fenced reserves. However, given the current focus of wildlife management practices in South Africa on fencing protected areas, additional habitat loss has been minimized. Further, due to more intensive management of the fenced reserves to maintain biodiversity, more stable prey bases and limited human-lion conflict are being observed.

According to South Africa's Scientific Authority's NDF published in January 2018, there are no specific official figures on the illegal trade in lions and lion products in South Africa, which is consistent with their 2015 NDF. There are currently no statistics relating to cases involving lions in the National Environmental Compliance and Enforcement Report, although there are cases currently under investigation. No recorded or known illegal trade in wild lion has occurred in Gauteng, KwaZulu-Natal or the Eastern Cape, and the illegal utilization of lions within South Africa's national parks is negligible. However, according to the NDF, lions along the Kgalagadi Transfrontier Park boundaries have been persecuted for decades. Illegal trade in captive-bred lions within the North West Province is suspected to take place, as this industry is large and a challenge to regulate. The 2017 NDF does not discuss in further detail the reports referenced in the 2015 finding, regarding the illegal translocations of animals or trade in lions and their body parts for which offenders were not in possession of a permit to breed, keep, hunt, catch, sell, convey or export live animals or parts thereof. According to the 2015 and 2017 NDF, and supported by information in the Service's final listing rule, the illegal local and international trade in lions poses a

moderate, but non-detrimental risk to the species in South Africa (BMP pg. 14; USFWS 2015, 80 Fed Reg. 79999).

To manage any population to maintain an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number of lions estimated to constitute a viable population is 500 individuals. Kruger National Park, with approximately 1,200 lions, has a stable population of wild lion and is considered a stronghold for lions in South Africa. Kgalagadi Transfrontier Park, with a stable population of approximately 400 lions, is considered a potential stronghold and conserves the genetic diversity within the Kalahari ecosystem (Bauer et al. 2008, in Riggio et al. 2013 (pg. 32); Bjorkland 2003 (pg. 515, 518). Wild lions in HiP, Addo Elephant National Park, Karoo National Park, and Marakele National Park, albeit smaller in size, appear to be stable, but would need to grow to be considered potential strongholds for maintaining genetic diversity. All of these populations receive very little direct management and hunting is not allowed within the National Parks (BMP).

Lion Management in South Africa: In 2015, in response to the requirements under NEMBA and the SADC Treaty, and after stakeholder workshops in 2013 and 2014, South Africa published the Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP) and stated that the "BMP for African lion will be regarded as the national strategy for African lions in South Africa" (pg. 2). The BMP was created in response to the Regional Strategy for Lions in East and Southern Africa in 2005 (IUCN SSC Cat Specialist Group 2006), which encouraged the development of national strategies aligned with national strategies of neighboring countries. The BMP was developed jointly by South Africa's Department of Environmental Affairs, Council for Scientific and Industrial Research (CSIR), and Dr. Paul Funston (Panthera). The current BMP is the first in a series of five-year iterations, as required under NEMBA, where the success of the preceding five years will be measured, and adaptations made to ensure that the plan for the following five–year period is appropriate for the circumstances at the time.

The BMP has identified the vision that "...lions will provide key opportunities for biodiversity conservation, economic development, social benefits, and improved management capacity." The BMP lays out five specific objectives for the conservation of wild and wild-managed lions within South Africa:

- Improve the conservation status of lions within the broader conservation context.
- Develop and implement effective communication tools that are informed by scientific research (communication, education, and public awareness).
- Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws.
- Establish a lion forum or working group.
- Collaborate the alignment of this BMP with lion conservation plans in neighboring countries and link with international working groups.

All five of these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the party responsible for implementation. The BMP will be re-evaluated in 2019 to assess the success of the plan and to modify the BMP for 2020 to 2025 accordingly.

While these five objectives appear to serve a valuable role in lion management in South Africa, two are most relevant in determining if the implementation of the BMP enhances the propagation or survival of the species, as required by the Act for the issuance of this import permit. The first objective, "Improve the conservation status of lions", has been broken down into three sub-objectives for wild and wild-managed lions: maintain current protection status of lions; reassess the conservation status of lions; and enhance the conservation status of wild lions. The intended 5-year outcomes of these sub-objectives are to have stable wild lion populations in all protected areas with no illegal trade in wild lions, have more than 80% of all reserves with wild-managed lions integrated into a managed meta-population approach for genetic management, publish norms and standards for the management of wild-managed lions, and a stronger understanding of wild-managed lion population size and trends. To achieve these sub-objectives, South Africa has already conducted population surveys of wild lions in 2015 and will census every 3 years. They have also started implementing the managed meta-population plan with the goal of over 80% of reserves included by 2019. The norms and standards for the management of wild-managed lions was to be completed by the end of 2016 and the first audits to obtain a stronger understanding of wild-managed lion population trends was completed in 2015 and is suppose to continue annually thereafter. One of the first outcomes of these evaluations has been the apparent tightening of how DEA assesses whether a reserve holds "wild-managed" lions or if the lions on a reserve are considered "captive-bred". As such, the Service consulted with the DEA on whether the reserve identified in this application where the trophy animal will be taken maintains wild-managed lions.

The second objective, "Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws", identifies two actions: ensure alignment on permitting decisions between national and provincial legislation; and address and implement training needs for all aspects of legislation regarding lions. The intended 5-year outcome of these two actions is to have well-trained managers that make better management decisions, and effective legislation to support lion conservation and sustainable utilization of lions.

The BMP has two additional objectives focusing specifically on wild-managed lions. As with the objectives discussed above, these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the parties responsible for implementation. The first is to maintain the wild-managed lions as a key population that contributes to socio-economic-ecological opportunities through mimicking "natural" ecological functions (e.g., wild lion survival rates, fecundity, litter sizes, and mortality rates). This objective is broken down to a number of action items ranging from mimicking survival changes through lethal and non-lethal removals, mimicking required immigration/emigration into an area, and measuring demographic responses by determining age- and sex-structure through ranger observations, and informing stakeholders on progress of management efforts. These action items predominately have target dates that are on-going, annual, or bi-annual, with outcomes that can be used in adaptive management efforts.

The second wild-managed lion objective is "To maintain lion genetic integrity by inducing social limitations through management-assisted dispersal and changes in dominance hierarchies", which focuses primarily on ensuring that lions within smaller fenced areas (<1,000 sq. km.) mimic natural biological processes such as natural dominance hierarchies and female dispersal to ensure genetic diversity. The action items for this objective include modeling genetic diversity within reserves, mimicking male dispersal from and into a social unit through removal (e.g., culling/hunting or translocation) and introduction (translocation) of males at appropriate ages, and mimicking occasional female dispersal into social units through removal and introduction.

The BMP has information on the lion's biology, habitat requirements, threats, and relevant legislation, as well as an extensive chapter on wild-managed lions. This chapter explores the history of wild-managed lions, particularly how lions had been managed in the past and what actions are needed to move forward in establishing a meta-population through connecting the reserves and allowing for genetically viable populations that can contribute to the overall wild lion population. According to the BMP, the wild lion populations are complemented by a fragmented population of wild-managed lions in South Africa found on fenced areas or reserves typically less than 1,000 square kilometers in size. This largely results from private property as well as wildlife ownership rights enforced by fencing as required by South African law. According to the BMP, even though opinions vary on the pros (Packer et al. 2013) and cons (Creel et al. 2013) of fencing as an essential component of range-wide lion conservation in the future, the use of fences is likely to increase as human land use continues to expand into lion ranges. The expanded use of fencing, particularly in areas where fencing is currently not widely utilized, could lead to continued fragmentation of lion habitats (Riggio et al. 2012, Dolrenry et al. 2014). Therefore, wild-managed lions in South Africa provides a key example on how to achieve integrated lion conservation goals in a changing African context that would enhance the survival of the species.

In the 1990s, the number of public and private game reserves started to increase in South Africa and many of them reintroduced lions, mostly as a tourist draw. Lions from these populations were then used for yet more reintroductions leading to a current number of about 800 lions on over 45 fenced reserves (Miller et al 2013). Many of these reserves have only one or two prides of lions, with the largest (Pilanesberg National Park and Madikwe Game Reserve) having four or five prides. Historically, most managers of these reserves had the tendency to manage their lion populations in isolation, although there was some movement of 'excess' lions.

Because of fragmented, isolated management of these populations, the conservation value of these lions has been questioned in the past (Hunter et al 2007, Slotow & Hunter 2009). Because of this, the BMP sets out management criteria within the reserves that maintains ecological processes and creates a meta-population (BMP pg. 41 and 42). Researchers noted indicators of inbreeding in two reserves (Trinkel et al. 2008, 2010), while several reserves experienced increased lion population growth rates with subsequent high lion densities (Miller & Funston 2014). The combination of high lion densities and restricted size of the reserves disrupts predator-prey relationships – often with prey dramatically declining (Tambling & du Toit 2005, Slotow & Hunter 2009). In addition, managers increasingly find it hard to locate new areas for 'excess' lions (Kettles & Slotow 2009). The Lion Management Forum (LiMF), founded in 2010, provides a platform for concerned

managers to discuss the unique issues surrounding small, fenced lion populations. LiMF members recognize that many of the natural processes characteristic of large naturally functioning lion populations have been disrupted on these small reserves. Given the small sizes of these reserves, limited opportunities exist for restoration of these natural processes Therefore, LiMF, and the BMP, have put forward management interventions that would mimic the outcomes of natural processes that are showing great success (Miller et al. 2013; Ferreira & Hofmeyr 2014).

The BMP recognizes that the managed lion meta-population is slightly contradictory to the theory of meta-population dynamics, as meta-populations are those with spatio-temporally variable subpopulation dynamics, variable dispersal, and availability of empty habitats that are largely connected (Oliveier et al. 2009). That is not the case with most wild-managed lion populations on small reserves in South Africa. Thus, in essence, the managed meta-population is a unique product of the South African response to managing and conserving large carnivores on isolated small reserves. The approach essentially recognizes a single population with social groups spatially isolated over vast areas. Some of these challenges can be reconciled through identifying regional nodes.

The lions for reintroductions into South Africa's small reserves were initially sourced from Etosha National Park, as well as Sabi Sand Game Reserve, adjacent to the Kruger National Park. Recently, SANParks relocated some animals from the South African park of Kgalagadi Transfrontier Park (Slotow & Hunter 2009). Managers applied minimal genetic management throughout the history of lion reintroductions (Slotow & Hunter 2009, Trinkle et al. 2010). As a result, geographic genetic structure in the wild-managed lion meta-population reflects mixed origins with few reserves having lions of only one origin (Miller et al. in review). The South African wild-managed lions thus represent a novel lion genetic diversity not associated with a single origin. Maintaining the origin of the base genetic stock is thus, according to the BMP, a low priority (BMP pg. 45).

Hunting and Utilization:

Hunting: According to the 2017 NDF (the last assessment available to the Service), hunting of wild lions is not allowed within national parks and only limited hunting is allowed in some provincial reserves, effectively ensuring protection for the majority of wild lions. There is some harvest of wild lions for the control of problem animals (e.g., stock-raiding) and, in very limited cases, population management within the national parks. In addition, a small number of wild lions from Kruger NP have dispersed out of the park into some of the reserves surrounding the park and may be harvested. According to the BMP, fewer than 2 wild lions and only approximately 10 wild-managed lions are taken off of private reserves annually.

South Africa has not set a specific annual quota for wild-managed lions. Instead, according to information provided to the Service, authorizations for hunting wild-managed lions are addressed on a case-by-case basis. Reserves maintaining wild-managed lions must submit an application to the provincial authorities requesting a permit. Professional Hunters are obliged to record all completed hunts in a professional hunting register and this register is used to compile provincial reports on the number of lions taken annually. The level of off-take is also evaluated in the management of the meta-population to ensure that only those animals that no longer meet

management goals are removed from the population. These animals are typically older lions that have successfully bred and raised several litters of kittens. Most experts consider the recommendation by Packer *et al.* (2011, p. 151) to limit offtake to no more than 1 lion per 2,000 km^2 to be a sustainable offtake of lions. The BMP (pg. 29) has established more restrictive limits for areas of less than 1000 km^2 to not exceed 0.5 lions/1000 km^2.

Utilization: An active lion bone trade from South Africa to several Asian countries for traditional medicinals is primarily supplied from captive-bred lions taken as hunting trophies, as well as captive-bred lionesses and juvenile lions (BMP pg. 30; 2017 NDF pg. 13). Lion bones are being used as a substitute for tiger bones, which is highly valued in Asia, primarily in China and Vietnam (Williams et al. 2015, pg. 1; Gratwicke et al. 2008, pg. 2–5; Graham-Rowe 2011, pg. s101–s102). In 2008, South Africa began issuing CITES permits for the export of skeletons of captive-bred lions to Asia. The number of lion skeletons for which South Africa issued permits for export to Asia (China, Viet Nam, Thailand and Lao PDR) increased tenfold from 2008 to 2011, from about 50 to about 573 skeletons, respectively, representing a total of 1,160 skeletons or about 10.8 metric tons (11.9 US tons) of lion bone in 4 years (Williams 2015, pp. ix–x, 46). With respect to meeting demand for lion bone, Lindsey et al. (2012, p. 20) states that there are likely to be large numbers of lion bones available for export from game farms, from lionesses and non-trophy males, and as byproducts from animals shot as trophies. In addition, Williams et al. (2015, p. 41) reports that there may be between 1,400 and 6,200 lion skeletons from past trophy hunts on South African game farms that could potentially be used to supply demand for lion bone. Further, at the 17th Meeting of the Conference of the Parties, the Appendix II listing for P. leo was amended to include an annotation establishing an export quota for lion bones. The annotation states that "[A] zero annual export quota is established for specimens of bones, bone pieces, bone products, claws, skeletons, skulls, and teeth removed from the wild and traded for commercial purposes. Annual export quotas for trade in bones, bone pieces, bone products, claws, skeletons, skulls and teeth for commercial purposes, derived from captive breeding operations in South Africa will be established and communicated annually to the CITES Secretariat." The Service is aware of a press release from the Endangered Wildlife Trust in which they state the DEA has established a quota of 800 skeletons (with or without skulls) of captive-bred lions for international trade, and as of this finding, the CITES website shows that as of January 17, 2018, South Africa has communicated a 800 skeleton export quota for 2017 to the CITES Secretariat. There is no quota listed for South Africa for the export of lion skeletons for 2018.

The BMP suggests that the value of bones, whether wild or captive-bred, is not high enough to stimulate the illegal harvest of lions solely to sell the bones into the bone trade. However, there is the potential that if the value of bones increases due to increasing demand from Asian markets, that captive-bred lions could be a legal source of bones that masks the illegal harvest of wild lions. According to Williams et al. (2015, p. x), the 2013 price paid to South African game farmers and landowners for lion bones was $1,260–2,100 USD per skeleton. In many lion range states, this exceeds per capita GDP (gross domestic product) (World Bank 2015, unpaginated). Thus, the current price paid for lion bones may provide an incentive in some countries to poach wild lions. While the lion bone trade appears to currently be based primarily in South Africa's captive-bred lion hunting industry, the trade appears to be having little or no impact on wild lion populations in South Africa at this time—lion populations in South Africa are stable or increasing and there is little

poaching of wild lions in the country (Funston and Levendal 2014, pp. 1, 26; Williams et al. 2015, pp. 79–80).

Evaluation:

As stated earlier, the Service has evaluated this application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild-managed lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

While there is habitat available to lions on the national parks and within the smaller, fenced reserves, much of South Africa has been converted into agricultural uses, managed plantation forests, human developments, or extractive industries. With the legalization of private ownership of wildlife in the early 1990s, there has been a significant increase in private land set aside for wildlife. This has led to a boost in South Africa's wildlife, particularly large mammals. South Africa laws, such as ToPS, were put into place to ensure that utilization of this wildlife is sustainable and provides for long-term incentives to maintain these areas for wildlife protection. The national parks and fenced reserves are natural areas surrounded by developement. It is only through the on-going management of these remaining natural areas that lions survive in South Africa. South Africa's management of wild and wild-managed lion population as a meta-population, using human intervention (e.g., translocation) as a substitute for natural occurrences (e.g., dispersal), is ensuring that lion populations are genetically healthy and viable.

While it has been stated that South Africa's hunting industry generates $1.1 billion annually, not all of this is connected to lion hunting or to United States hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and a draw for United States hunters, such as Mr. Whitworth, to South Africa. Based on the information available to the Service, the presence of private reserves has increased the number and diversity of wildlife in South Africa, thus fueling the hunting industry, which funds the on-going success of private reserves. It appears that without the hunting industry, these reserves, which have become islands of wilderness surrounded by civilization in much of South Africa, would not be economically viable, and therefore would not exist. Both ToPS and the BMP have put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in South Africa. With an annual harvest of approximately 10 wild-managed lions, South Africa is not exceeding the limits identified in the BMP of 0.5 lions/1,000 sq. km. The objectives of the BMP and the actions and

monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that South Africa has established for managing lions.

Therefore, based on the information available to the Service and seeing that Umbabat Private Nature Reserves has been determined by the DEA to maintain a wild-managed lion population, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The national management plan, the BMP for lions is extensive and addresses many aspects of lion conservation and management. As reviewed above, the BMP provides a history of the relevant legislation with regards to lion conservation and puts the current efforts into context. The BMP also reviews the species' biology, population status, habitat requirements, and threats to lion populations. Objectives for conservation of the species, as well as a plan to develop a meta-population for wild-managed lions, are also included. Additionally, the monitoring plans have scientifically sound methodologies. Lastly, but equally importantly, are the monitoring and evaluation efforts laid out in the BMP.

In evaluating the information provided by the South African government and other sources, it appears that the hunting program in South Africa is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The fenced reserves, including Umbabat Private Nature Reserves and national parks are maintaining habitat for lions and ensuring that there is no further habitat loss, provided that the reserves can remain economically viable. In order to maintain a viable population of wild and wild-managed lions, the parks and reserves must maintain biodiversity and a sustainable prey base. Finally, while there is still controversy over the extensive utilization of fencing in South Africa, it does reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions on these reserves and, the limited hunting of lions under this management program contributes to the on-going survival of the species in South Africa.

The off-take of this wild-managed lion provides an indirect benefit to wild populations by helping to support the reserve where lion populations participating in the meta-population management are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, South Africa is closely monitoring and controlling the harvest of wild and wild-managed lions through permitting under ToPS and through the BMP. The issuance of an import permit for a wild-managed lion legally hunted in Umbabat Private Nature Reserves under these authorities would not conflict with any programs intended to enhance the survival probably of the species in South Africa.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted wild-managed lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, wild lions only occur in a limited number of national parks in South Africa and wild-managed lions are currently found on 45 reserves of less than 1,000 sq. km. While the wild lions on the national parks receive only limited direct management activities, the reserves require management that is more intensive in order to mimic natural biological and ecological roles of lions. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the presence of these reserves, including Umbabat Private Nature Reserves, as well as the parks, is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. While the concept of lions behind fences has both benefits and drawbacks, it appears to be a major contributor to the on-going survival of lions in the wild in South Africa. While open and unmanaged habitat not impacted by human intervention would be the ideal conditions for lion populations in South Africa, as well as throughout its natural range, this is not a viable option within South Africa.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt that Mr. Whitworth wishes to undertake in will contribute to reducing the threat of extinction of lions in South Africa. It appears that the permitting activities under ToPS and the implementation of the BMP will ensure the long-term survival of lions. The utilization of hunters such as Mr. Whitworth in managing the populations on theses reserves is an important element of the success of lion management in South Africa.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduced the threat of extinction facing lions in South Africa.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions, but particularly captive-bred lions. However, this opposition, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that the legal harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

Based on our understanding of the permitting process under ToPS, reserves that maintain wild-managed lions must establish biodiversity plans for managing the reserve that takes into consideration the long-term survival of all species on the reserve, including large predators. This oversight by DEA and the implementation of the BMP establishes a framework in which reserves manage their wildlife. The long-term survival of lions, at least in South Africa, is tied directly to the success, both ecologically and economically, of the reserves. The reserves that have been permitted to maintain wild-managed lions and, as part of the management program, carry out limited hunting, have the expertise and facilities to maintain lions successfully. This includes Umbabat Private Nature Reserves, which is confirmed to be part of the ANRP, and a participant in the meta-population management of wild-managed lions.

Therefore, based on the information available to the Service, the applicant intends to hunt on a properly permitted reserve that carries out their management practices in accordance with national and provincial regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective states in the application.

Conclusion

Given the current status of wild and wild-managed lions within South Africa and the level of management and oversight provided to them, it appear that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant intends to hunt on a properly licensed reserve that is actively managing lions in a manner that will maintain the species on the reserve, and through the national meta-population management plan, in a manner that mimics natural processes.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild-managed lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild-managed lion trophy taken in South Africa, to Kenneth Wayne Whitworth, Hardinsburg, KY**.

Emma Nelson 6/7/18
Emma Nelson, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/7/18
Mary Cogliano, Chief
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Division of Management Authority

REFERENCES:

Bauer, H., Nowell, K., & Packer, C. (2008). Panthera /eo, IUCN 2010. IUCN Red List of Threatened Species. Version 2010.4.

Biodiversity Management Plan for the Lion (Panthera leo) in South Africa (BMP; December 2015): Funston, P. J. & Lavendal, M. (2015). Biodiversity Management Plan for the Lion (Panthera leo) in South Africa. Department of Environmental Affairs, Republic of South Africa. 63 pp

Bjorklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (Panthera leo) Conservation Genetics, 4, 515-523

Cousins, J. A., Sadler, J. P., and Evans, J. (20 l 0). The challenge of regulating private wildli fe ranches for conservation in South Africa. Ecology and Society XX(YY): ZZ. [online] URL: https://www. researchgate.net/profile/Jo nathan _Sad le r/pub lication /44854322_The_Challengc_ o(_Regu lat ing_ Pr ivate _ Wil dli fe_Ranches _for_Conservation_in _ So uth _ Afric a/li nks/0c 96051 4ca0b 84f295000000.pdf

Creel, S., Becker, M. S., Durant, S. M., M'soka, J., Matandiko, W., Dickman, A. J., & Stanley Price, M. (2013). Conserving large populations of lions-the argument for fences has holes. Ecology letters.

Crowley, K., and Mokhema, T. (2014). Lions Hunted to Save Rhinos in South African Circle of Life. Bloomberg [online] URL: http://www.b loo mberg.co m/news larticles/2014-08 -19 /lio ns-h untc d- to-preserve-rhinos-in-south-african-circle-of-life

Department of Environmental Affairs, Scientific Authority of South Africa. 2017. Non-detriment Finding Assessment for Pathera leo (African lion). No. 41393.

Dolrenry, S., Stenglein, J., Hazzah, L, Lutz, R.S. and Frank, L. 2014. A Metapopulation approach to African lion (Panthera leo) conservation. PLoS ONE 9(2): e88081. Doi: 10-1371/ joumal.pone.0088081.

Ferreira, S.M. and Hofineyr, M. 2014. Managing charismatic carnivores in small areas: large felids in South Africa. South African Journal of Wildlife Research 44(l):32-42.

Graham-Rowe, D. (2011). Endangered and in demand . Nature 480 (22 December 201 l): st 01-s103.

Gratwicke, B., Mills, J., Dutton, A., Gabriel, G., Long, B., Seidensticker, J., Wright, B., You, W. & Zhang, L. (2008). Attitudes toward consumption and conservat io n of tigers in China. PLoS ONE 3 (7): e2544.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Ricke lton, M., Walker, C., Slotow, R. and Skinner, J.D. (2007). Restoring lions Panthera leo to northern KwaZulu-Nata l, So uth Africa: short- term biological and technical success but equivocal long-telTil conservation. Oryx 41: 196-200.

IUCN Species Survival Commission (2012). Guiding Principles o n Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN Species Survival Commission (SSC) Cat Specialist Group. (2006a). Regional Conservatio n Strategy For The Lion Panthera leo In Eastern and Southern Africa. 60 pp.

Kettles, R. and Slotow, R. (2009). Management of free-ranging lions on an enclosed game reserve. South African Journal of Wildlife Research 39:23-33.

Lindsey, P., Alexander, R., Balme, G.A., Midlane, N. & Craig, J. (2012b). Possible relationships between the South African captive-bred hunting industry and the hunting and conservation oflions elsewhere in Africa. South African Journal of Wildlife Research 42 (1), 11-22.

Miller, S.M., Bissett, C., Burger, A., Courtney, B. and Dickerson, T. (2013). Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and best practice guidelines. South African Journal ofWildlife Research 43(3):138-154.

Miller, S.M and Funston, P.J. (2014) Population growth rates oflions (Panthera leo) on small fenced reserves in South Africa: a management dilemma. South Africa Journal of Wil dlife Research 44:43-55.

Oliveier, P.J., Van Aarde, R.J., and Ferreira, S.M. (2009) Support for a metapopulation structure among mammals. Mammal Review 39:178-192.

Packer, C., Brink, H., Kissui, 8. M., Maliti, H., Kushn ir, H., and Caro, T. (2011) Effects of trophy hunting on lions and leopards in Tanzania. Conservation Biology. 25:142-153.

Packer, C., Swanson, A., Canney, S., Loveridge, A., Garnett, S., Pfeife r, M., ... MacNulty, D. (2013). The case for fencing rema ins intact. Ecology Letters 16 : 1414-e4.

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., ... Pimm, S. (2013) . The size of savannah Africa: a lion ' s (Panthera leo) view. Biodiversity and Conse, n ation, 22(1), 17-35.

Slotow, R. and Hunter, L.T.8. (2009) Reintroduction decisions taken at the incorrect social scale devalue their conservation contribution: the African lion in South Africa. in: M.W. Hayward and M.J. Somer (eds). Reintroduction of Top-Order Predators. pp. 41-73. Wiley-Blackwell, Oxford.

South Africa (2004). National Environmental Management Biodiversity Act 10 of 2004. www.gpwonline.co.za

Tambling, CJ. and du Toit, S.T. (2005) Modelling wildebeest population dynamics: Implications of predation and harvesting in a closed system. Journal of Applied Ecology 42:431-441.

Trinkel, M., Ferguson, N, Reid, A., Reid, C., Somers, M. et al. (2008) Translocating lions into an inbred lion population in the Hluhluwe iMfolozi Park, South Africa. Animal Conservation 11:138-143.

Tinkel, M., Funston, P., Hofineyr, M., Hofineyr, D., Dell, S., Parker, C., and Slotow, R. (2010) Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13:374-382.

USFWS (2015) Final ESA listing rule for Panthera lea leo and P. I. melanochaita. 80 Fed. Reg. 79999.

Williams, V.L., Newton, DJ., Loveridge, A.J., & Macdonald, D.W. (2015). Bones of Contention: An Assessment of the South African Trade in African Lion Panthera leo Bones and Other Body Parts. TRAFFIC, Cambridge, UK & WildCRU, Oxford, UK.

World Bank. 2015. The World Bank Annual Report 2015. Washington, DC. © World Bank. https://openknowledge.worldbank.or g/handle/10986 /22550 License: CC BY 3.0 IGO.

LION SOUTH AFRICAN ESA TROPHY

Permit Number: MA83426C-0

Effective: 06/07/2018 Expires: 06/06/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KENNETH WAYNE WHITWORTH

(b) (6) [redacted]

HARDINSBURG, KY 40143
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539(a); 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in South Africa for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

January 16, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over $51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another $5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km^2. Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes $73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.

- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

RCVD FEB 2 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for one permit to import a lawfully hunted African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signe (b) (6) [redacted]

Name: Kerrigan R Walker

Date: 12/07/17

Department of the Interior
U.S. Fish and Wildlife Service FEB - 2 2016

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
WAIBEL	KERRIGAN	R.	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6 b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
POWELL BUTTE	OR	97753	CROOK	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: UN SURE OF PERMIT # No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other , and I certify that the information submitted in this application for a permit is complete and accurate to the lse statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      All parts including skin, skull, teeth, and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      Zambia, Mumbwa West Game Management Area, GIS: S15 04 01.5; E 026 08 36.9

   b. Date wildlife was hunted:

      July 14, 2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Full skin, skull, teeth, claws, floating bones.

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Plot 10549, Lumumba Road, Lusaka, Zambia.

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Mangomba Safaris
Business Name:	Mangomba Safaris
Address:	Plot 2170/M
Address:	Leopards Hill Road, PO Box 30084,
City:	Lusaka
State/Province:	Central Province
Country, Postal Code:	Zambia

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.
Please see information provided by Conservation Force, Zambian authorities, Zambian operators, and others.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported

Applicant's signature (b) (6) Date: _____

Be aware that there r ...our local or state government, as well as required by o ...r propose activity. While the Service will attempt t ...l.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ENHANCEMENT REPORT

MANGOMBA SAFARI COMPANY, LTD.
Plot 2170/M Leopards Hill Road, Box 30084, Lusaka.
mangombasafaris@yahoo.com
Mumbwa West Game Management Area, Zambia

I. DESCRIPTION OF COMPANY AND CONCESSION

Mangomba Safari Limited has been operating in West Mumbwa Concession since April 2016 after a ban for almost three years. The concession is 1,441 km² and provides habitat for a range of species including buffalo, lion, leopard, hippo, waterbuck defassa, kudu, roan, eland, reedbuck, oribi, impala, bushbuck, hyena, warthog, zebra, hartebeest, and sable (lion and lion prey). Our concession is in the West Mumbwa Safari Area and it has been categorized as a prime area by our Wildlife Authority. We have a lease with the Wildlife Authority for seven years, renewable.

Our company is family-owned and has been operating in this country for 14 years. We employ three professional hunters, four game trackers, twenty-five anti-poaching scouts, and six camp staff (cooks, waiters, cleaning, miscellaneous). **Altogether our operations support at least 100 dependents in local villages.**

We have a written concession plan with anti-poaching and community components.

II. ANTI-POACHING COMPONENT

Our concession agreement requires that we have an anti-poaching program/plan and report about it to the Wildlife Authority. The Wildlife Authority considers our contributions in determining whether to renew the concession.

A. Law Enforcement

Mangomba Safari Limited is very much aware that law support enforcement is very cardinal, to enable the officers from the Wildlife Authority on the ground carry out patrols in order to ensure the hunting block is well protected from poaching activates. To this effect the outfitter

has committed to pay the sum of $51,176.00 to be shared among the three Community Resource Boards in the area.

B. Fire Management

The outfitter is committed to pay the sum of US$2,222.00 towards the management of fire in the hunting block. The outfitter has further committed to provide transport to assist the department of wildlife and the community to curb fires and management of early burning activities.

C. Scouts Management

We supply rations once per month to the scouts to ensure they are sufficiently equipped for the patrols.

Since operations from late April 2016, no elephants were seen and we only found one dead elephant. During the opening season of 2017, we have physically seen elephants and a lot of movement in and around the camp. Physical presence of the scouts in and around the camp has made a positive response.

From late November 2016 to date:

Item	Spend (USD)	Notes
Scout salaries	750.00	Law enforcement, fire control
Scout equipment	-	Infrastructure development,etc
Diesel / petrol	1,000.00	Total contribution: $30,000.00
Rations for WA and community scouts	500.00	
Wage for the driver	250.00	
Wages for monitoring team	250.00	
TOTAL	2,750.00	

D. Distribution of meat to the Community

The outfitter also distributes edible carcasses to the community as a measure to reduce poaching by the community. A minimum of 50% of hunted meat is distributed to the community and it is shared amongst them through their community resource boards by a liaison officer who is employed by the outfitter.

E. Road Clearance

The outfitter also sends out road crews approximately every two weeks to check the condition of the roads in the concession, as a way of ensuring that the patrol of the area is done effectively.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

Mangomba Safari Limited is committed to pay about US$51,176.00 to be shared among three community Resource Boards in equal amounts of US$17,000.00 per community Resource Board to be reviewed after every hunting season.

The outfitter has further committed to pay the sum of about US$5,882.00 towards infrastructure development and maintenance. In the foregoing, the outfitter has agreed to rebuild two dilapidated camps at Kachekeleko and Nangoma. Nangoma will be constructed as a fly camp. The construction of the camps will be Kachekeleko in the second year and then Nangoma respectively to ensure that the camps are completed before the end of the concession for the outfitter. Further the outfitter is also committed to pay a US$5,882.00 towards the resource monitoring to enable that all the available resources on the ground are well monitored.

IV. OTHER INFORMATION

Prey Base

Mangomba Safari Limited's anti-poaching efforts and fire management have allowed the lion and Leopard prey base in our concession to grow over the past year. We estimate that our plains game (kudu, sable, etc.) will increase by 10%.

Lion and Leopard Population Tracking

Lion and Leopard are notoriously difficult to survey or census. To track the Feline population trend in our concession, ABC Safari Company maintains a Google Earth database of both Lion and Leopard sightings and tracks. We record sightings, spoor, or footprints and as much data is known on the individual. Because we keep tabs on both feline species in our concession, we are assured that the regulated, limited offtake is sustainable.

Lion and Leopard Aging Approach

Mangomba Safari Limited has been following an age-based policy for African lion trophies since 2016, we have adopted a company rule not to harvest lion below six years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective. We successfully harvested mature (aged six of older) male lion up to our quota (of two).

Lion Hunting Revenue

Lion and Leopard are our highest-value species. We require 21-day safaris for lion and Leopard require 14 day safaris. Our daily rate is $1,800.00 per day, plus a trophy fee of $15,000 (lion) and $6,500 (Leopard).

We generate approximately 85% of overall revenue from lion and Leopard hunts, and approximately 50% of our annual revenue from lion hunts alone.

U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

Mangomba Safari Limited regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

All Lion and Leopard hunts are studied and scrutinized on camera to determine their age and size before they are actually shot.

Lions are seen on almost daily basis indicating a healthy growing population. Only 1 Lion is on quota.

Signed: _____

Operator Name: Mangomba Safaris Limited

Title: Director

REPUBLIC OF ZAMBIA

The Zambia wildlife Act
(Act No 12 0f 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

NON RESIDENT HUNTING LICENCE Nº 18808

(Regulation 3 (2)

Station of issue: Chilanga Date of issue: 06/07/2017

DETAILS OF LICENSEE

Full Name: KERRIGAN R WAIBEL NRC/Passport No

Nationality: Tel/Fax

Addrsss

Full Name of Safari company: Mwamba Safaris

Company Cert. Incorporation No.: Date of incorporation

Postal Address: Box 30084 LSK

Residential Address:

Firearm Licence/Tourist's Firearm import No: ...Caibre of Firearm(s):

Type of Hunt Hunting Block:

The above named Safari company and its bona fide Clients are authorised by this licence under the Guidance of a Professional hunter to hunt the follwing Game or Protected animals within the Game Management Area or hunting block Specified hereunder and for the specified period and upon payment of the fees specified below

Species of animal	Number	Sex	Hunting Area	Hunting Period	Fees US$
Lion	1	M	Mumbwa	2017	
			West		
				Total Animals Fees	
				Concession Fees	
				Grand TOTAL	

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
- 6 JUL 2017
PRIVATE BAG 1 CHILANGA

Note:
Original copy to be retained by the Licencee
Duplicate copy to be forwarded to the Director - General or to an agent
Triplicate to be retained in the book

Date 06/07/2017

Director General

No. 12219

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 12 of 1998)

Form ZAWA 14

The zambia wildlife
(Licences and fees) Regulations, 2003

RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTING LICENCE
(Regulation 6)

DETAILS OF PROFESSIONAL HUNTER

Full Name: MARK A. SWANEPOEL NRC/Passport No (b) (6) [redacted]

Safari Company on behalf of which the Professional hunter is submitting this return: MANGOMBA SAFARIS

DETAILS OF CLIENT

Full Name: KERRIGAN R. WAIBEL NRC/Passport No (b) (6) [redacted]

Postal Address: C/O MANGOMBA SAFARIS

Non Resident Hunting Licence No: 23746 Date of issue: 06/07/17

Name of Hunting block hunting was conducted: MUMBWA WEST GMA

Hunting period: 08/07/17 to: 31/07/17

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export Yes	Trophy for Export No	Foreing currency valu charged to client
09/07/17	PUKU / M	01	—	S15°0953.3 E25°5852.5	✓	Lic	18813
09/07/17	IMPALA / M	01	—	S15°0953.4 E25°5852.3	✓	Lic	18814
11/07/17	WATERBUCK / M	01	—	S15°0418.5 E26°1094.4	✓	Lic	18811
14/07/17	LION / M	01	—	S15°0401.5 E26°0836.9	✓	Lic	18808

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Lenth of Horn
PUKU			17"
IMPALA			16"
WATERBUCK			28"
LION			

DETAILS OF PAYMENTS MADE

Type of payment	Currency	Amour
Amount of foreign currency paid by the client directly to the Safari Co. for the services rendered by the Co. including overheads & Extras		
Amt of foreign currency paid by the Saf Co. On behalf of the client to the DG for animals, Licences and Hunting rights.		
Total Amount Paid		

Verification by (a) Client: I certify that the animals listed on this return were hunted by me during the period stated and the total amount of foreign currency stated and paid by me to the Safari Company is the full amount I was charged

(b) Professional Hunter: I certify that the animals listed on this return were actually hunted by the client in accordance with the terms & conditions of a Non Resident Hunting Licence & that the foreign currency stated above is the full amt. Paid by the client for the hunt

Date: 29/07/17

Signatures: Client

Professional Hunter

Wildlife Police Officer

White copy to the Director General ZAWA
Yellow copy to the Safari Company
Blue copy to be retained by Professional Hunter

LEOPARD AND LION HUNT RETURN FORM

Each animal hunted should be accompanied by a separate data sheet and all measurements should be in metric units

Name of Professional Hunter: MARK A SWANEPOEL	Monitoring Scout	Rank:

DETAILS OF CLIENT

Name of client: KERRIGAN R. WAIBEL	Nationality: USA
Country of Residence: USA	
Address: USA	

GMA permit No.: 23746	Non Resident Hunting Licence No: 18808

DETAILS OF HUNT AND TROPHY MEASUREMENTS

Name of GMA: MUMBWA WEST	Hunting period	
Name of Hunting Block: MUMBWA WEST.	From (Date): 08-07-17	To (Date): 31-07-17

Date Killed or wounded	Species	Killed or Wounded	Sex (Tick)		GPS Location (in decimal degrees - hddd.ddddd)	
					Latitude	Longitude
14-07-17	LION	KILLED	Female	Male ✓	S15°04 07.5	E026° 08 36.9

Date measured (DD/MM/YY):	Total length (Nose to tip of tail - cm)	Tail length (cm)	Shoulder height (Shoulder to base of paw in cm)	Skull length (cm)	Skull width (cm)
24-07-17	275 cm	95 cm	187.5cm	39.375 cm	23.75 cm

PHOTOS & SAMPLES (tick in space provided for photos & samples taken)

1. Whole body from the side*	✓	7. Teeth before cleaning (front & side)*	✓	12. Ridges on back of Lower canines	
2. Mane from the top*	✓	8. Teeth after cleaning (front & side)	✓	13. Tissue samples taken	
3. Face & head from the top*	✓	9. Lower Jaw from side	✓	14. Premolar extracted	
4. Face & Chest*	✓	10. Ridges on back of Upper Canines			
5. Nose*	✓	11. Whisker spots (Right & Left)	✓		

*These photos should be taken at kill site before skinning and in as good of light as possible. Teeth and nose should be blood and dirt free to provide clear assessment

DATA RECEIVED BY:	DATE:	SIGNATURE:

Vargas, Darcy <darcy_vargas@fws.gov>

75473C / Lion Trophy Import

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Jun 7, 2018 at 5:04 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>, jjw-no <jjw-no@att.net>

Dear Mr. Jackson and Ms. Lennox,

Ref: 75473C

Upon further review of the referenced application, it was noticed that page 1 of the application was not dated. Therefore, please provide an updated application, with an original signature and date (no photocopies), along with the previously requested documentation on the lion's age.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by July 22, 2018, (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Regards,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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Vargas, Darcy <darcy_vargas@fws.gov>

75473C / Lion Trophy Import

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Jun 7, 2018 at 4:36 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>, jjw-no <jjw-no@att.net>

Dear Mr. Jackson and Ms. Lennox,

Ref: 75473C

The referenced application request to import one male African lion trophy from Mangomba Safari Company, LTD, in Mumbwa West GMA, Zambia, is under review. However, in order to complete processing your application, we need additional information. Therefore, please provide the following:

1. Provide documentation that shows the age of the lion you are requesting to import.

In accordance with 50 CFR 13.II(e), if the requested information is not received by this office by July 22, 2018, (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-C75473C

Enhancement Finding
Applicant: Kerrigan R. Waibel (PRT-75473C)

Kerrigan R. Wabel submitted an application on February 2, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 14, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively,

except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import

of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Waibel's application involving a *P. l. melanochaita* sport-hunted trophy taken in Mumba West GMA, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Waibel's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Waibel's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Waibel's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Waibel's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Waibel will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Waibel, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Waibel.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Kerrigan R. Waibel.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

Permit Number: MA75473C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KERRIGAN R WAIBEL
(b) (6)
POWELL BUTTE, OR 97753
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A Force For Wildlife Conservation

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay
† Bert Klineburger

BOARD OF DIRECTORS:
John J. Jackson, III, J.D.
Chrissie Jackson
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Shane Mahoney
Renee Snider

January 16, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over $51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another $5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km^2. Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes $73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.

- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

RCVD FEB 2 2018

December 28, 2017

U.S. Fish & Wildlife Service
Attention: Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Federal Fish and Wildlife Permit Application Form 3-200-20
Permittee Thomas Michael Zulim
African Lion – ESA-Threatened-Listed
Zimbabwe Deka Tails Safari Area, Hunting Season 2019

Dear Sir or Madam:

Accompanying this cover letter is my application for the above referenced African lion import permit for the calendar year 2019 hunting season. As noted in the application, the lion hunt will take place during the period August 1 through 18, inclusive, 2019, in Zimbabwe in the specifically noted Deka Tails safari hunting area.

Also, accompanying this application is (i) my check in the amount of $100.00 for the application fee and (ii) a Notice of Representation designating representatives of Conservation Force as my attorneys and legal representatives for all matters concerning this application.

Please let me or the representatives at Conservation Force know if you have any questions or require any additional information.

(b) (6)

Thomas M Zulim

(b) (6)

Hockley, Texas 77447

cc:

Conservation Force
3240 S. I-10 Service Road West, Suite 200
Metairie, LA 70001

Hunter International Brokerage Services, Inc.
5674 Stoneridge Drive, Suite 209
Pleasanton, CA 94588

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Thomas M Zahn

Date: December 28, 2017

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD FEB 2 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)
THREATENED - LISTED
AFRICAN LION

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Zulim	Thomas	Michael	NA

(b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution: NA		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Hockley	Texas	77447	Waller	USA

(b) (6) [redacted] ddress; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Hockley	Texas	77447	Waller	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d)) CHECK ATTACHED. CHECK NO. 4172

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA30345C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other a… ormation submitted in this application for a permit is complete and accurate to the b… subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

S… d or stamped signatures) 12/28/2017 Date of signature (mm/dd/yyyy)

…o next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P.1. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      See attached E.2.a.

   b. Date wildlife is to be hunted:

      See attached E.2.b.

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      All parts, including skin, skull, teeth and claws.

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      NA

   b. Date wildlife was hunted:

      NA

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

NA

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

NA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Andy Hunter
Business Name:	Chipatani Safaris
Address:	8 Rivonia Road
Address:	Mount Pleasant, Harare
City:	Zimbabwe
State/Province:	
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

NA

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calenda[redacted] imported into the United States, cannot be r[redacted]

Applicant's [redacted] Date: 12/28/2017

Be aware th[redacted] your local or state government, as well as requ[redacted] our propose activity. While the Service will[redacted] val

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

I WILL USE A DESIGNATED PORT.

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as indicated on page 1.

10. ~~If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.~~ NA

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Tom Zulim
(b) (6)

John L Jackson or Regina Lennox of Conservation Force
jjw-no2@att.net or regina.lennox@conservationforce.org
504-837-1233

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.2.a.

The lion hunt will take place during the period August 1 through 18, inclusive, 2019, in Zimbabwe with the safari operator and in the safari hunting area noted below.

Nengasha Safaris

Country:	Zimbabwe
Operators Name:	Nengasha Safaris
Address:	36A Townsend Road, Suburbs, Bulawayo, Zimbabwe
Zimbabwe Tourism	
Operators HOP number:	0178
Area of hunt/place:	Deka Tails Safari Area, Zimbabwe
Land owners name:	Zimbabwe Parks and Wildlife Authority
GPS coordinates:	Latitude: 18 degrees, 53 feet, 82 inches South
	Longitude: 26 degrees, 70 feet, 19 inches North
Closest town:	Hwange Town, Zimbabwe
Area:	Matetsi Block, Zimbabwe
Region/Province:	Matabeleland North Province, Zimbabwe
Professional Hunter:	George Hallamore
PH license number:	144 (issued by Zimbabwe National Parks and Wildlife)

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.2.b.

The lion hunt will take place during the period August 1 through 18, inclusive, 2019.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.

a. Please see the information previously provided to USFWS by Conservation Force, Bubye Valley Conservancy, Save Valley Conservancy, and the Zimbabwe authorities, all of which are incorporated herein by this reference.

b. Please see the information accompanying this application, and incorporated herein by this reference, prepared and previously submitted to USFWS by Zimbabwe Parks and Management Authority titled: "*Legal Trade, Conservation and Rural Livelihoods: a Zimbabwean Perspective; - L.W. Nyaguse*".

c. Please see the USFWS Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018, dated October 11, 2017, all of which in incorporated herein by this reference.

d. Please see the information accompanying this application, and incorporated herein by this reference, undated but pertaining to the hunt year 2017, by Paul Bernie, operator of the Deka Tail safari area in Zimbabwe.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.b.

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

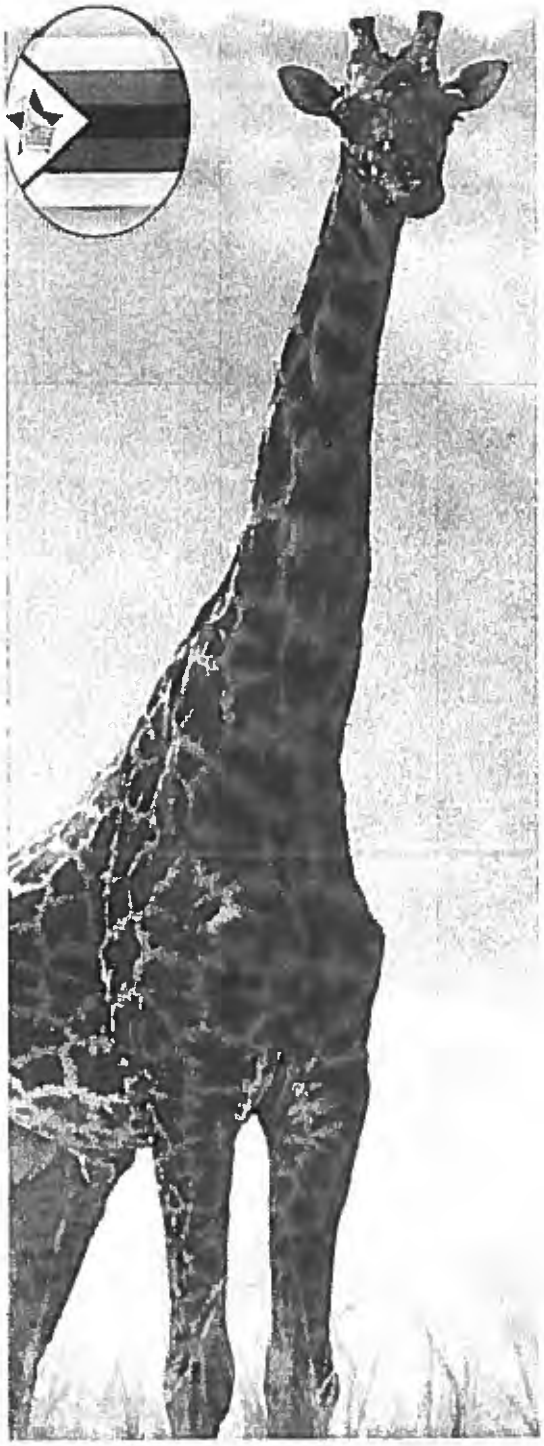
LEGAL TRADE, CONSERVATION AND RURAL LIVELIHOODS: A ZIMBABWEAN PERSPECTIVE:

- L.W. NYAGUSE

Attachment E.5.b. 23 pages

AREAS TO BE COVERED

- Sustainable Utilisation
- Population Status of Key Species
- Quota Setting and CITES Quotas
- Quota Setting Considerations
- Legal Trade Framework
- Funding For Conservation
- Rural Livelihoods and Legal Trade
- How Does CAMPFIRE Work
- Community Benefits
- Revenue Generation
- Impacts of Community Benefits on Conservation



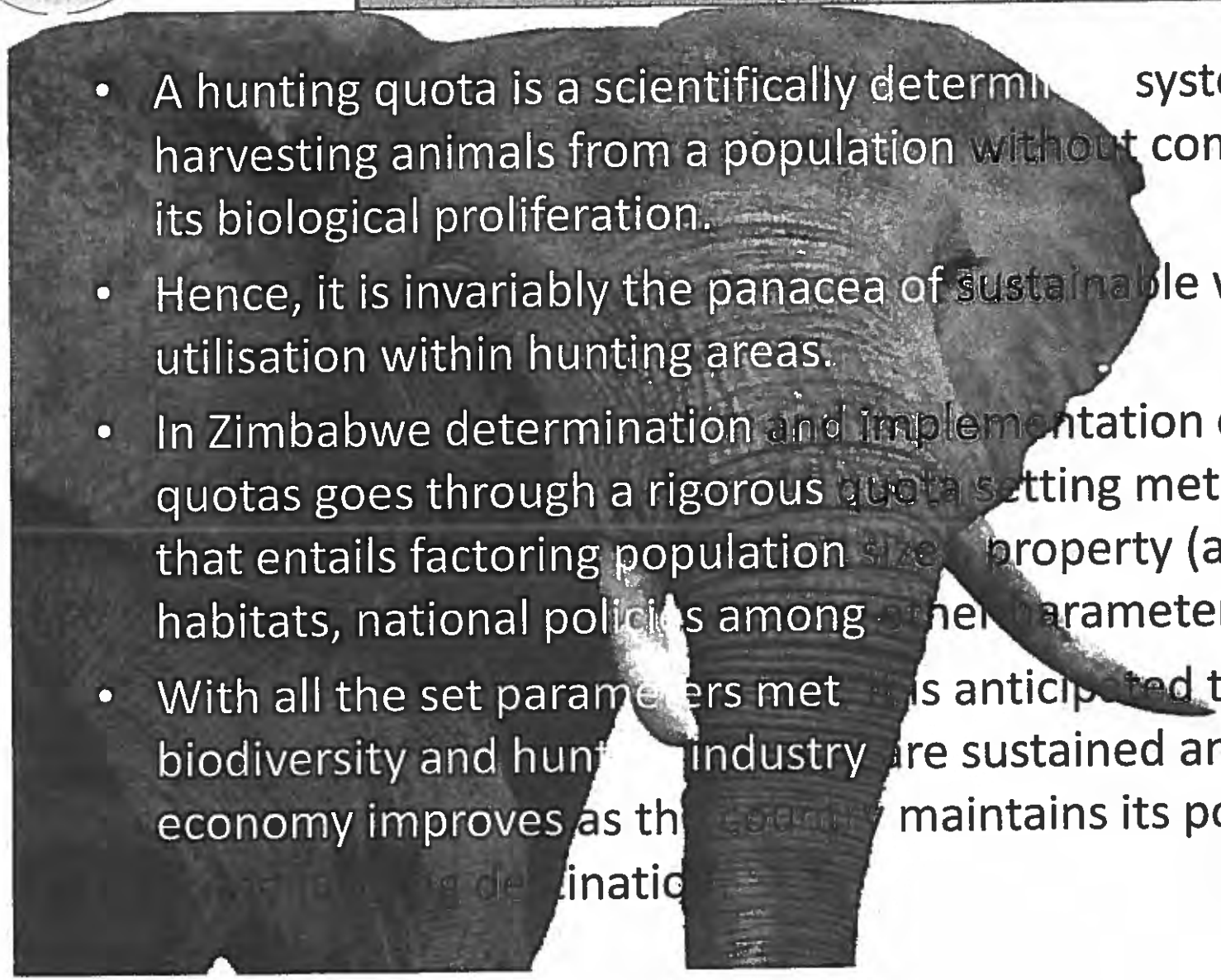
SUSTAINABLE UTILISATION

- Zimbabwe's conservation is based on the principle of sustainable utilisation, that the various species that are being conserved must contribute to conservation. This is the major source of funding for conservation.
- How successful has the concept been?????
- Adaptive management is probably one of the most important concepts in the implementation of this philosophy.

POPULATION STATUS OF KEY SPECIES (ELEPHANTS)

REGION	1980	1983	1989	1993	1995	2001	2014	2001 vs. 2014
North-West Matabeleland	20 444	25 888	27 411	27 841	30 985	49 310	53 949	9.4% increase at 0.7% per annum
Zambezi Valley	10 152	9 907	13 029	14 361	16 842	19 297	12 2 11	36.7% decline at 2.8% per annum
Sebungwe	11 126	9 302	12 946	10 742	11 796	13 989	3 634	75% decline at 5.7% per annum
Gonarezhou	4 704	3 985	5 286	5 241	4 156	4 992	10 722	115% increase at 8.8 % per annum
TOTAL	46 426	49 082	58 672	58 185	63 779	88 123	80 516	8.6% decline at 0.7% per annum

Quota Setting and CITES Quotas



- A hunting quota is a scientifically determi system of harvesting animals from a population without compromising its biological proliferation.
- Hence, it is invariably the panacea of sustainable wildlife utilisation within hunting areas.
- In Zimbabwe determination and implementation of hun quotas goes through a rigorous quota setting methodology that entails factoring population size property (area) sizes habitats, national polici s among other parameters
- With all the set parame ers met is anticipated that biodiversity and hunt industry are sustained and the economy improves as th maintains its position a de tinatio

Quotas and Quota Setting Considerations

1. CITES National Quota
2. National aerial survey results
3. Research publications and preliminary results
4. Off takes for key species including leopards, lion and elephant
5. Size of property relative to the species requested and distribution
6. Illegal Off-take/Poaching
7. Property based Ecological assessments
8. Management regime on the properties (habitat, fire, water, land-use planning and zonation, fencing, supplementary feeding).
9. Human wildlife Conflict hotspots, Communal Benefits and conflict mitigation
10. Species sensitivity
11. Other off-takes (illegal management offtakes, live sells)
12. Trophy Quality
13. Habitat Change/fragmentation
14. Recommended sustainable off-take levels
15. Offtake Data

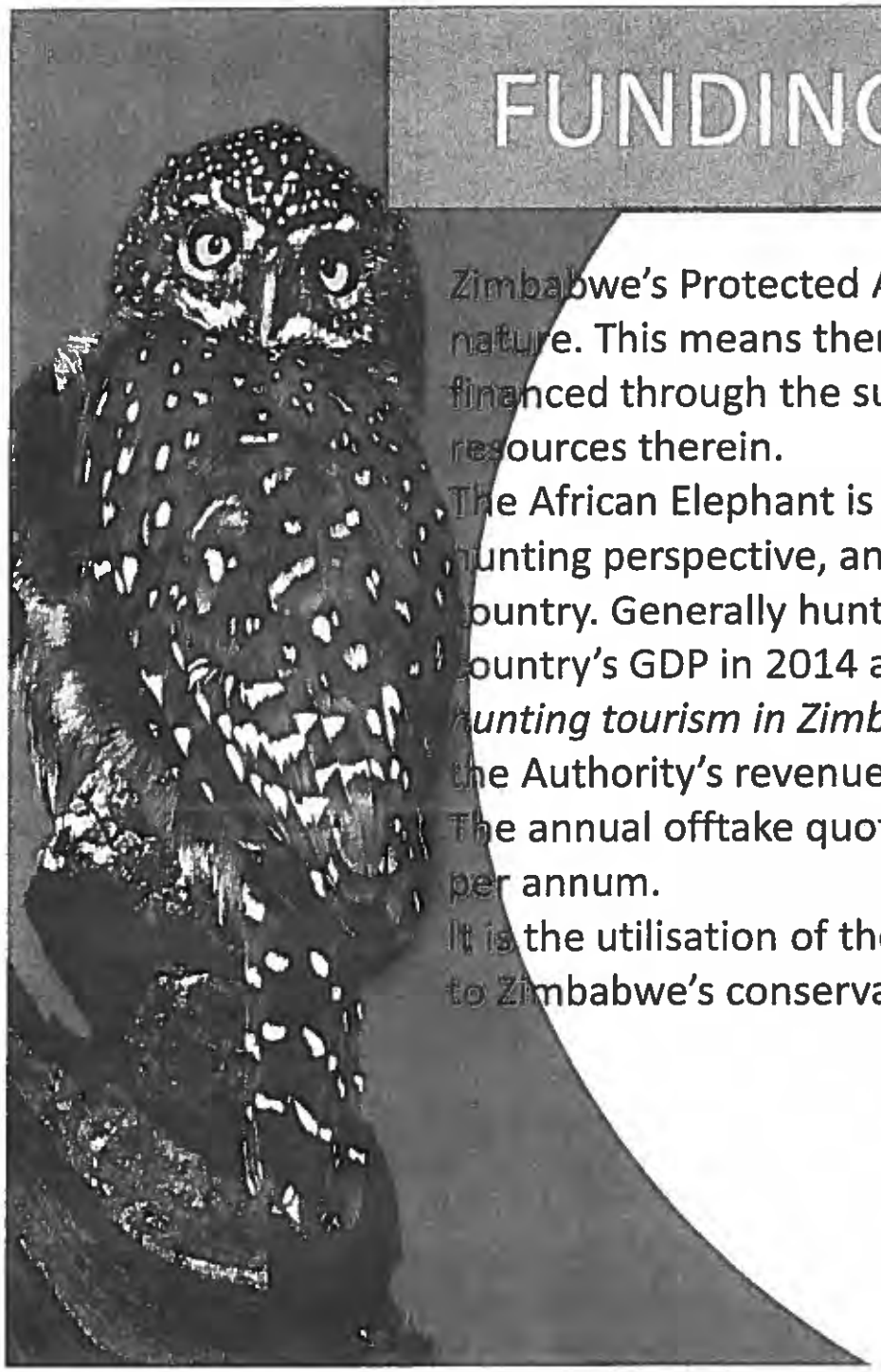
Quota Setting and CITES Quotas

Species	CITES Quota
Elephant	500
Leopard	500
Crocodile	200
Cheetah	50

LEGAL TRADE FRAMEWORK

- Current CITES regulations on trade in elephant and elephant products for Zimbabwe have an annotation affecting Zimbabwe's population of *Loxodonta africana* on Appendix II which restrict trade in hunting trophies for non-commercial purposes, trade in live animals to appropriate and acceptable destinations, trade in hair, hides, and leather goods for non-commercial purposes and trade in registered raw ivory for whole tasks and pieces.

FUNDING CONSERVATION



Zimbabwe's Protected Area Management system is self-funding in nature. This means therefore that the resource protection budget is financed through the sustainable utilisation of the various wildlife resources therein.

The African Elephant is one of the biggest drawcard species from a hunting perspective, and is at the centre of all the major hunts in the country. Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015 (*RBZ Exchange control report on hunting tourism in Zimbabwe*) and contributes about 20% annually of the Authority's revenue budget.

The annual offtake quota provided through CITES is for 500 elephants per annum.

It is the utilisation of these offtake quotas that contribute significantly to Zimbabwe's conservation budget.

FUNDING CONSERVATION

Zimbabwe's Protected Area Management Funding

	2013	2014	2015	2016	2017
	Actual	Actual	Actual	Budget	Budget
	US$	US$	US$	US$	US$
REVENUE					
Hunting Income	5,423,995	5,072,493	3,256,698	4,418,700	3,000,000
Sale of park products/live sales	515,509		810,000		
TOTAL Revenue	**5,939,504**	**5,072,493**	**4,066,629**	**4,418,700**	**3,000,000**
EXPENDITURE					
Operational costs	5,766,886	6,071,981	5,123,926	7,525,500	4,000,000
Staff costs	16,850,007	20,294,821	19,705,931	21,666,800	19,725,000
Administration costs	2,558,886	3,244,961	2,922,619	2,004,900	2,000,000
TOTAL EXPENDITURE	**25,175,779**	**29,611,763**	**27,752,476**	**31,197,200**	**25,725,000**
SURPLUS/ DEFICIT	**-19,236,275**	**-24,539,270**	**-23,685,847**	**-26,778,500**	**-22,725,000**

RURAL LIVELIHOODS AND LEGAL TRADE

- One of the biggest CBNRM initiatives in Zimbabwe is the Communal Areas Management Programme For Indigenous Resources (CAMPFIRE)
- CAMPFIRE has a combined 2.4 million beneficiaries, made up of 200,000 households that actively participate in the program, and another 600,000 households that benefit indirectly from social services and infrastructure supported by CAMPFIRE income within districts.
- There are in excess of 120 elected and constituted Village and Ward CAMPFIRE Committees that operate through specific Traditional Leaders in their areas. *'Communal' in the acronym CAMPFIRE, has since been changed to 'Community' in order to focus on communities instead of the geographic spread of the programme.*

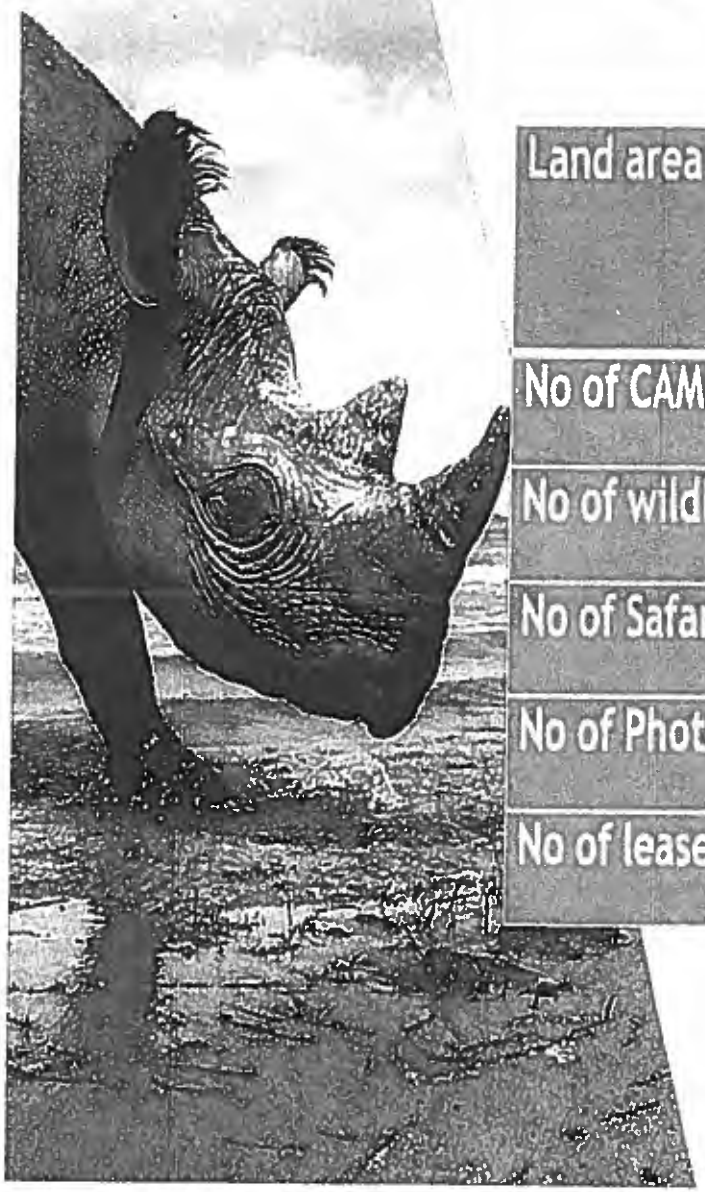
HOW CAMPFIRE WORKS

There are rural communities living adjacent or around most of Zimbabwe's National Parks or Protected Areas. These communal areas are under Rural District Councils (RDCs)

In the 1980s, the Zimbabwean government embarked on a Community Based Natural Resources Management Programme which would empower the rural communities to manage and utilise the natural resources in their districts.

To this end, the communities applied for and were given Appropriate Authority over their wildlife resources. This appropriate Authority meant that they could then embark on empowerment programmes for their own benefit.

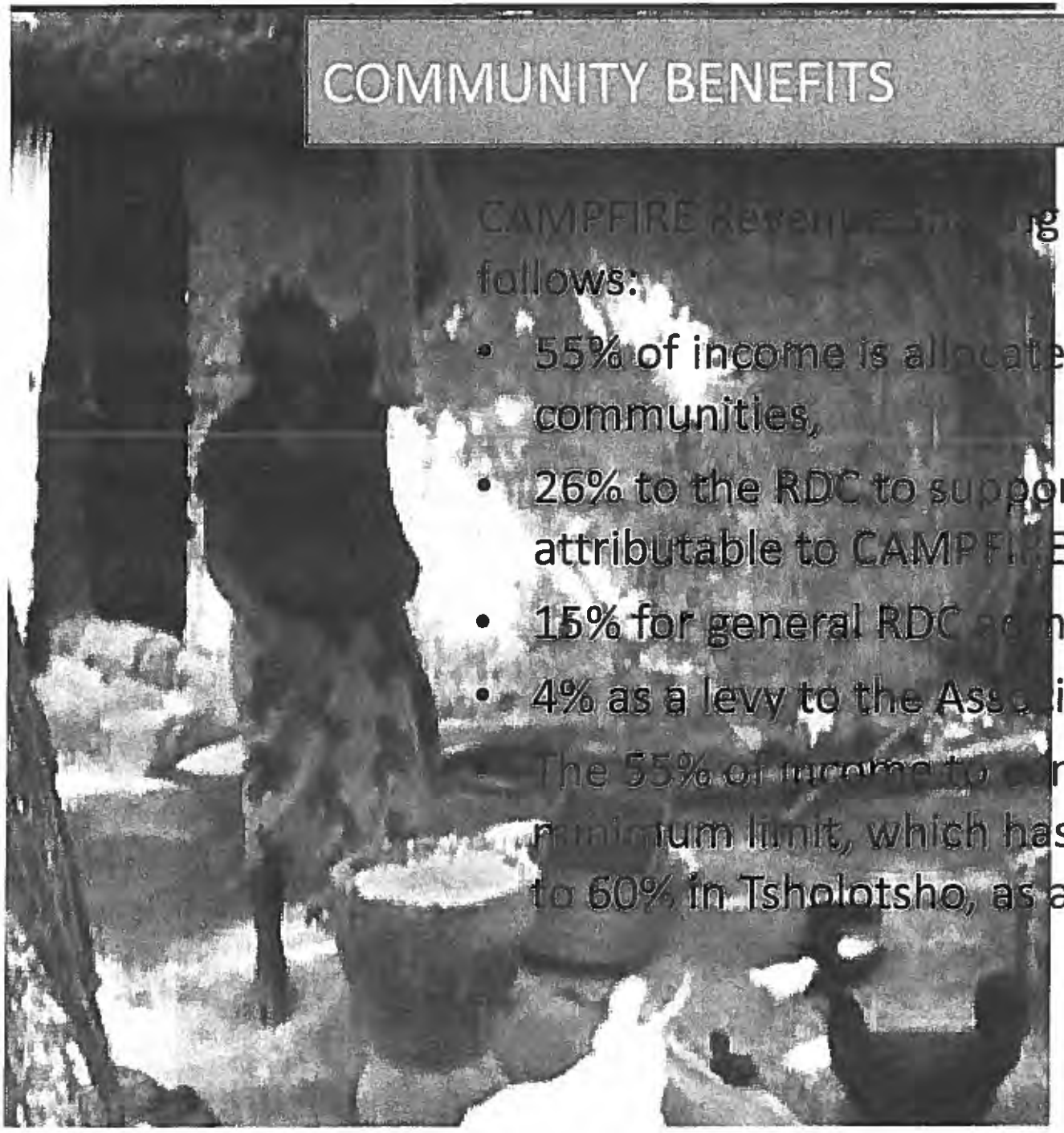
All these districts fall under the CAMPFIRE Associatio



CAMPFIRE AREAS

Land area under CAMPFIRE	50,000 km^2 - 12% of Zimbabwe
No of CAMPFIRE Districts	58
No of wildlife districts	28 (15 active in hunting)
No of Safari Operators	33
No of Photographic safaris	10
No of leased Parks Safari Areas	4

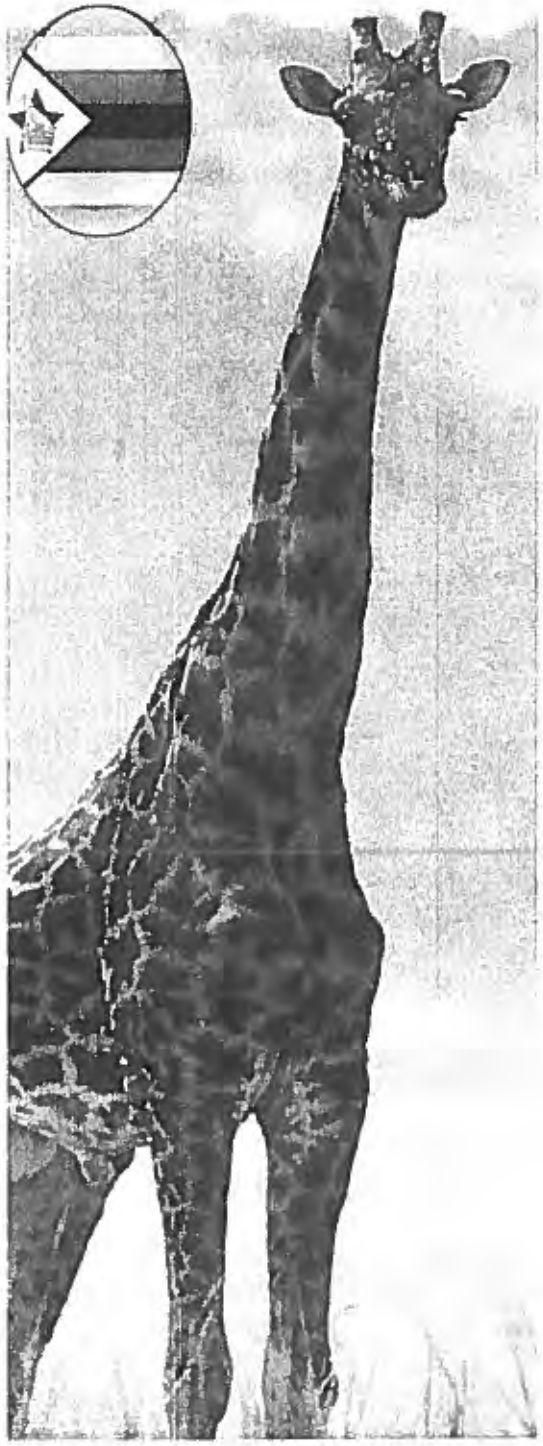
COMMUNITY BENEFITS



CAMPFIRE Revenue Sharing Guidelines are as follows:

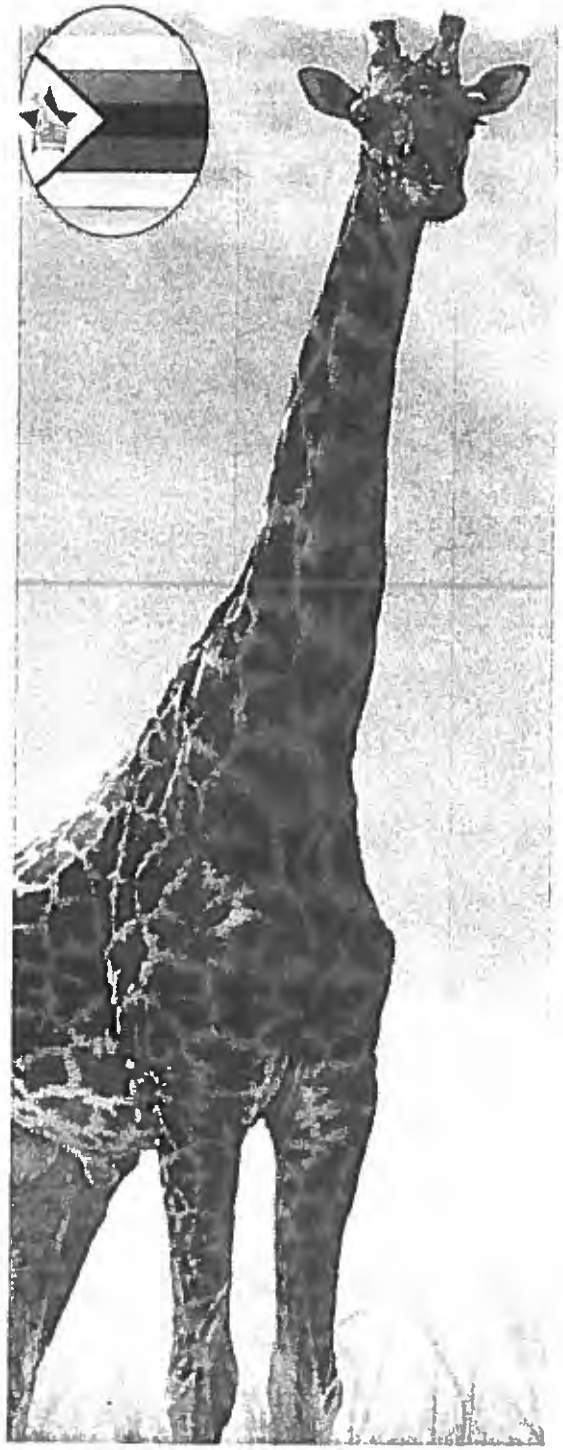
- 55% of income is allocated to communities,
- 26% to the RDC to support costs attributable to CAMPFIRE activities,
- 15% for general RDC administration, and
- 4% as a levy to the Association.

The 55% of income to communities is the minimum limit, which has been exceeded to 60% in Tsholotsho, as an example.



REVENUE GENERATION - HWANGE

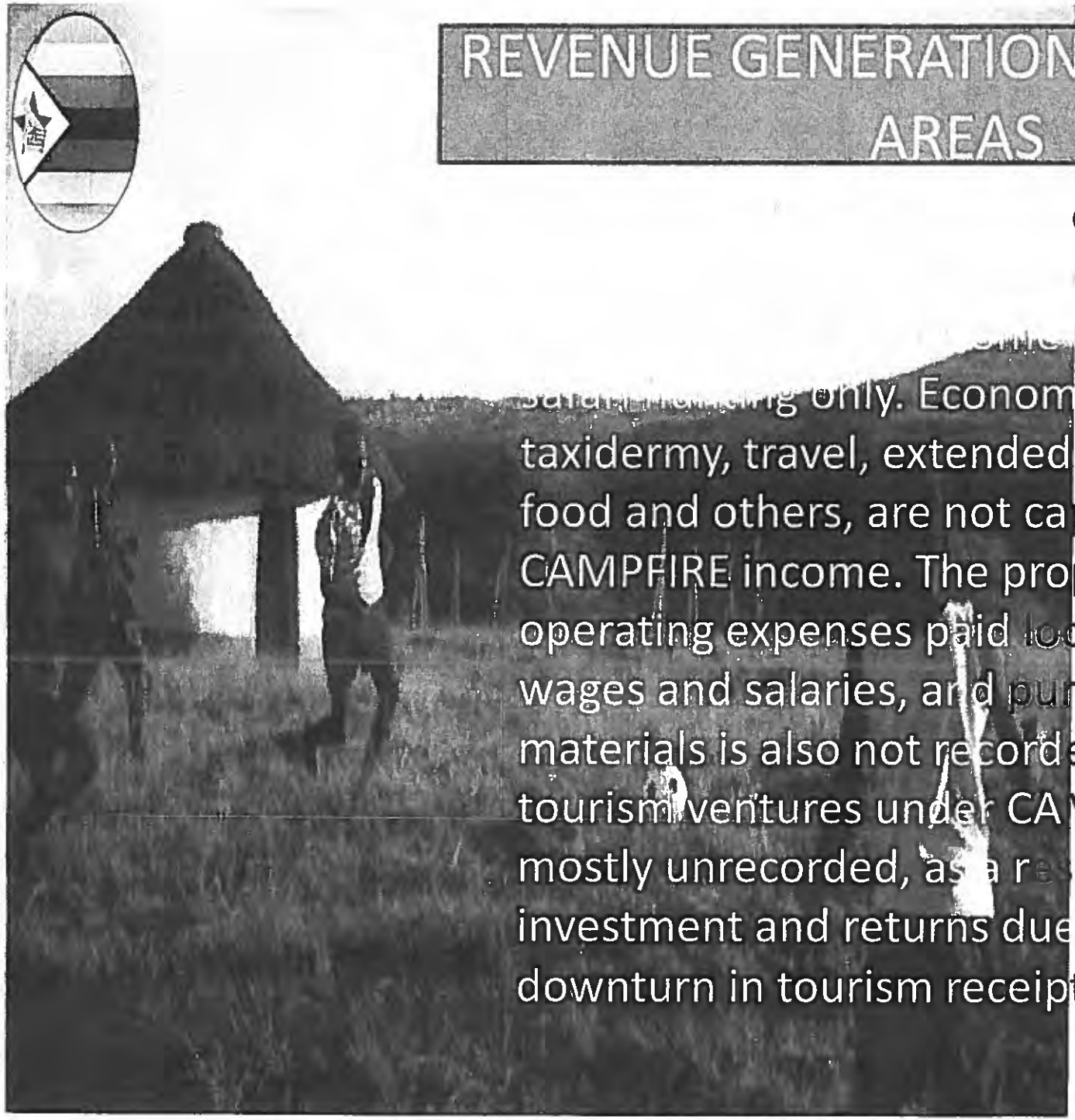
YEAR	GROSS INCOME	COMMUNITY 55%	CAMPFIRE MGT 26%	COUNCIL LEVY 15%	CAMPFIRE ASS 4%
2009	32,500	17,874	8,450	4,875	1,300
2010	41,725	22,948	10,848	6,258	1,669
2011	63,070	34,648	16,398	9,460	2,522
2012	74,408	40,924	19,346	11,161	2,976
2013	65,300	35,915	16,978	9,795	2,612
2014	85,777	47,177	22,302	12,866	3,431
2015	49,350	27,142	12,831	7,402	1,974



REVENUE GENERATION IN CAMPFIRE AREAS

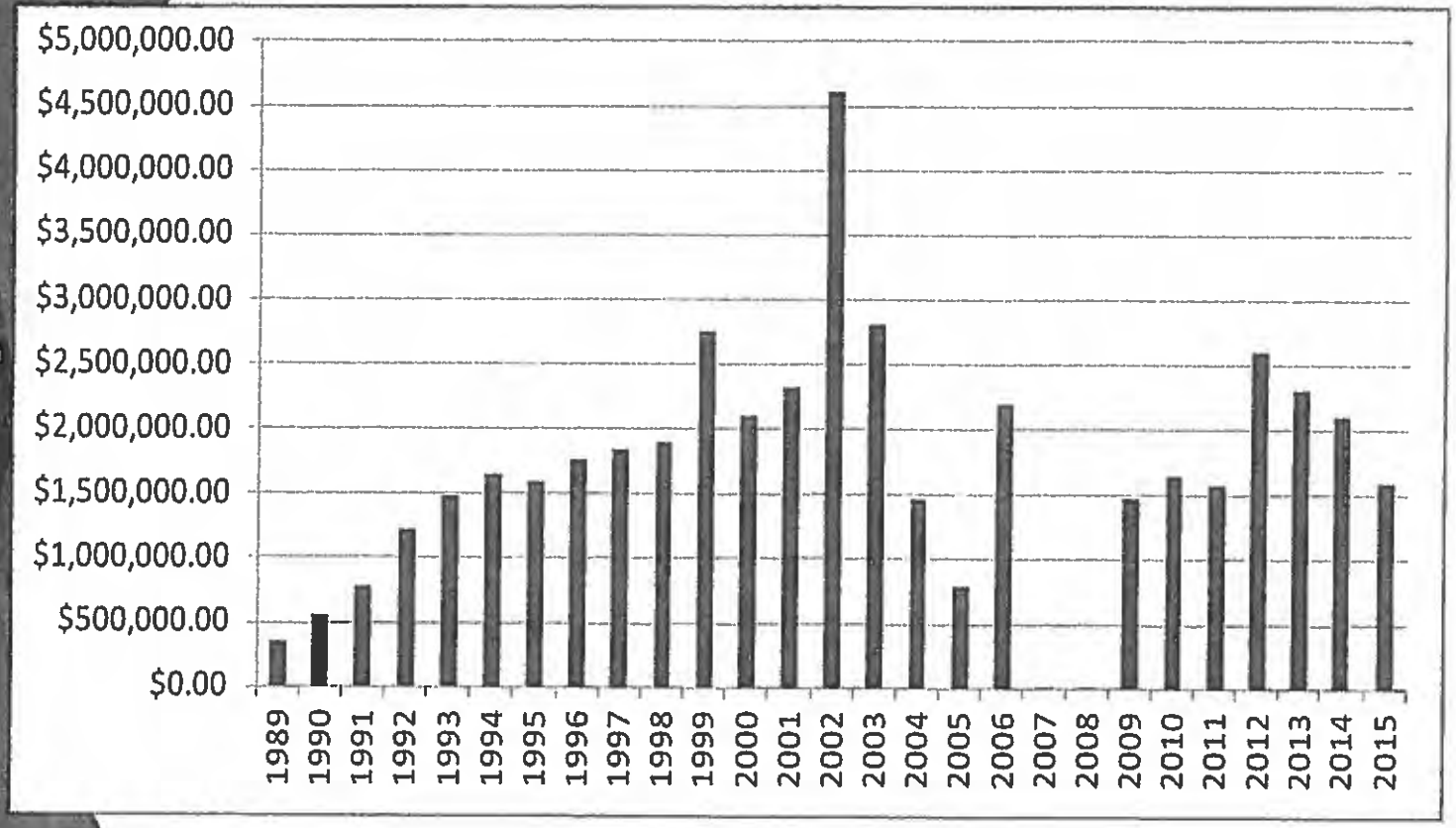
- On average CAMPFIRE generates nearly US$2million per year. This means that communities in major CAMPFIRE areas receive about US$1million every year in total. Since 2007, these communities have been opening their own bank accounts to receive cash from safari operators under a Direct Payment System. This system eliminates previous delays in money reaching the communities and ensures that communities see the value of wildlife.

REVENUE GENERATION IN CAMPFIRE AREAS



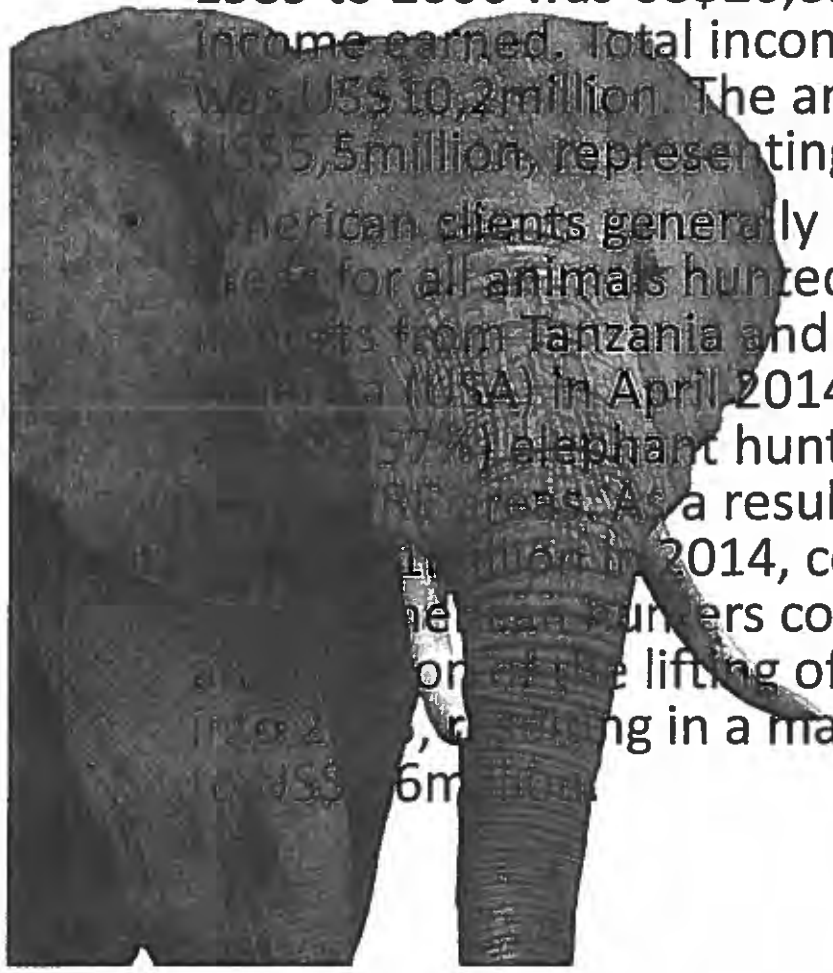
e, CAMPFIRE as it is largely receipts from g only. Economic multipliers like taxidermy, travel, extended tourism activities, food and others, are not captured as part of CAMPFIRE income. The proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is also not recorded. Income from tourism ventures under CAMPFIRE is also mostly unrecorded, as a result of low investment and returns due to the current downturn in tourism receipts for the coun

REVENUE GENERATION – CONT'D



MODELS FOR REVENUE DISBURSEMENTS

- The gross amount disbursed to communities as dividends from 1989 to 2006 was US$20,8million, representing 52% of the total income earned. Total income generated between 2009 and 2015 was US$10,2million. The amount disbursed to communities was US$5,5million, representing 54% of total income earned.
- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 147 (73%) elephant hunts initially booked by US citizens in 2014. As a result of the ban, CAMPFIRE income dropped to US$1,6million in 2014, compared to US$2,3million in 2013, as American hunters conducted their safaris nevertheless in anticipation of the lifting of the ban. However, the ban continued in 2015, resulting in a massive decline of total CAMPFIRE income to US$0,6million.



Use of Income

- Revenue received by communities (about USD1 million annually) helps directly offset the costs of living with wildlife.
- Most communities have voluntarily invested in infrastructure which has long term benefits such as clinics, schools, and grinding mills.
- However, in some areas, the projects are spread too thinly to meet the needs of a growing number of people.
- Other communities have drilled boreholes, constructed seasonal roads, erecting of fencing to keep out wildlife, purchase of tractors, and direct purchase of drought relief food. Children benefit from reduced walking distances through the construction of schools, procurement of learning materials, and payment of school fees from CAMPFIRE proceeds.
- Communities also benefit from meat in excess of the requirements of safari hunting operations, and from problem animal control.

COMMUNITY PROJECTS FUNDED FROM CAMPFIRE REVENUE

District	Project
Beitbridge	Rehabilitation of schools, clinics and protection of irrigation schemes
Bilifima	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing of fields and rehabilitation of lodge, community truck, tractor, dam repair machinery.
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinics, mothers waiting shelters, teachers' houses, primary schools, community-grinding mills, Police sub-office, piped water and electrification of clinic.
Hurungwe	Construction of classroom block - Nyamakate Secondary, Maintenance of Nyamakate bridge. Purchase of tractor tube, Payment of carpenters, Roofing Chipfuko Primary School and Huyo Secondary School, CAMPFIRE Ward tractor major service, Purchase of Treasurers bicycle, Payment of Nyamakate Clinic guard, 7 resource monitors allowances, 26 bag cement Chitindiva, Kabidza , Manyenyedzi and Mawau cchools for toilets construction, Renovation Karuru School (5 bags cement), and toilet construction, Chitindiva Clinic toilet construction, Roofing Chikova Secondary School, Purchase of buiding materials Chikova Secondary Block, Painting Dete Primary School, Building toilets Makwiye school, Building shed Mupuse school, Roofing Bhashungwe primary school, Sanyati Bridge camp renovation, Purchase of Cement Tashinga Primary School, 6 pairs uniform for resource monitors, Purchase of 20 bags cement Chisipite Primary School, Purchase of tyres for ward tractor, Bridge maintenance
Mbire	Clinics, nurses houses, ward offices, storerooms, 14 classrooms, 7 teachers houses, grinding mills, school offices, wildlife administration offices, 2 hand pump boreholes, water piping, toilet, water storage tanks, 2 tractors, a basic tourist camp with 4 chalets;
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu primary, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	Classroom blocks and furniture (Sihazela, Mlevu, Mtshwayeli, Ntulula, Dibutibu, Gwaai, Nkwizhi, Zibalongwe, Malindi, Mgodimasili, Phelela, Mpilo, Jimila, and Kapane Primary schools), 2 F14 cottages, 10 sewing machines (Dibutibu Secondary school), 7km piped water system for Thembile primary school, Sikente Clinic, Tshitatshawa and Jowa clinics construction, fencing of Madlangombe clinic, 10 water engines, borehole drilling and repairs and repair kits, Lister diesel engines for 6 villages in ward 21 and at Sihazela Line in ward 1, grinding mills, solar water pumping in wards 1, 2 and 4. 2 pickup trucks for wildlife monitoring purchased in 2015.

IMPACT OF COMMUNITY BENEFITS ON CONSERVATION

- Every time there is human-elephant conflict, the communities need to see that action is taken by the Authorities, either through compensation for loss and/or damage and through eliminating further potential threats. Any inaction by the Authorities usually results in communities taking matters into their own hands, to the detriment of the wildlife resources therein. However, where communities derive benefit and where there are locally designed and built-in mechanisms for compensation for the whole community through the utilisation of the resources, the communities tend to be more tolerant towards the animals.
- Elephant damage to Community Property includes the following;
- Destruction of crops which affects both the quality and quantity of harvests and impacting negatively on food security;
- Destruction of property;
- Depletion of water sources;
- Destruction of water infrastructure;
- Reduced grazing land;
- Restricted access to essential commodities such as firewood;
- All this results in loss of property and opportunities to carry out other activities due to time spent guarding crops and property.

THANK YOU

MAZVITA!!!

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.c.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA

OCT 11 2017

Memorandum

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018

After evaluating the available information from the Government of Zimbabwe, other information available to the U.S. Fish and Wildlife Service (Service), and comments received from interested parties, the Service has determined that permits for the importation of sport-hunted trophies of wild lions (*Panthera leo melanochaita*), which are threatened under the Endangered Species Act (ESA), taken in Zimbabwe during the 2016, 2017, and 2018 calendar years **meet** the enhancement criteria under the Service's regulations at 50 CFR 17.32. Therefore, applications received for import of such specimens will be considered to have met this requirement. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized. The Service will reassess the situation in Zimbabwe towards the end of the 2018 season to determine if hunts conducted in 2019 and beyond continue to meet the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the ESA was warranted and proposed a rule under section 4(d) of the ESA to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the ESA) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under section 4(d) of the ESA, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion

Attachment E. 5. c. 24 pages

subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the ESA and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the ESA to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, although individual import permits will be evaluated and issued or denied for each application. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, the Service encourages the submission of information from individual applicants. We rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)) , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies.

Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not

perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* are expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding for Lions in Zimbabwe:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC)*

Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the

CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for the present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA's mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation

area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the ESA, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach et al. 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward et al. 2007). Outside of protected areas, the lion's prey base is much reduced (du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations

also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96% of the all national parks) and safari areas (92% of all safari areas). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lion are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014 used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the

only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on the each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the ESA for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The

quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "(t)he costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implement a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari-hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural

communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests average 2.7% of adult male lions annually. This percentage has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe, were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further,

according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a five-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore,

sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016), only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015).

As agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 and 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters accounted for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport hunters conduct lion hunts in these areas; if so, the Service is not aware if sport hunters are exempted from the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System (TRAS) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account

fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria based on information available to the Service, we have been able to determine that sport-hunted lion trophies taken in 2016 and 2017 would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in BVC and SVC during 2005-2015. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to local communities, which incentivizes them to conserve the African lion. In the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted;

ZPWMA (2016) reports that the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of SVC from cattle to wildlife (du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. Although U.S. hunter participation in lion hunts is not enough to make or break the industry, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term negative impact.

Further, through the *Strategy and Action Plan,* Zimbabwe has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, and revise our finding as appropriate.

Therefore, based on the information available to the Service. and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit being requested is adequate to justify removing lions from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million

hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserve the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge et al. 2007, Whitman et al. 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based quota-setting process. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounted for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions with in Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continue to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the current status of lions within Zimbabwe and the level of management and oversight provided to them, the Service is able to find that the harvest and import of sport-hunted trophies of lions within Zimbabwe meet the purposes of the ESA. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe and the Service will reassess lion management within Zimbabwe and whether the importation of sport-hunted trophies enhance the survival of the species at the end of the 2018 hunting season or at which time substantive information becomes available to the Service in the interim.

Although the Service is able to make a finding that the management of lions within Zimbabwe meet the enhancement criteria under the ESA, there are certain documents and data the Service needs to evaluate in order to continue our current finding past the 2018 hunting season. The Service expects to be able to review data from the 2016, 2017, and 2018 hunting seasons to assess the lion populations and ensure that management efforts are enhancing the propagation and survival of the lion within Zimbabwe. Given that Zimbabwe's last management plan for lion was produced in 2006, the Service would like to see an updated plan established. Local management plans, such as the Management Plan for Hwange National Park will be sought. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will seek updates on further progress of the outputs or targets not yet accomplished. Lastly, the Service will also seek an update on the quota setting process. Specially, we will need further information on the establishment and implementation of precautionary quotas.

Therefore, with the information currently available to the Service, the Service is able to make a determination that the import of lions taken in Zimbabwe in 2016, 2017 and 2018 would meet the issuance criteria under 50 CFR 17.32. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application received for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized.

REFERENCES:

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2015a. Panthera leo. The IUCN Red List of Threatened Species: e.T15951A50658092.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L.T.B., Macdonald, D.W., and Packer, C. 2015b. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. PNAS doi: 10.1073/pnas.1500664112

Bijlsma, R., and Loeschcke, V. (2012), Genetic erosion impedes adaptive responses to stressful environments. Evolutionary Applications, 5: 117–129. doi:10.1111/j.1752-4571.2011.00214.xCAMPFIRE (2015). An Overview.

Björklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023/A:1024737317695

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-04.pdf

Craigie, I.D., Baillie, J.E.M., Balmford, A., Carbone, C., Collen, B., Green, R.E., and Hutton, J.M. 2010. Large mammal population declines in Africa's protected areas. Biological Conservation 143(9):2221–2228.

Creel, S., M'soka, J., Dröge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, O., and R. Mandisodza-Chikerema (2016). Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

EcoWeb (2015). Campfire Hunting Income and Distribution.

Elliot, N. B., Valeix, M., Macdonald, D. W. and Loveridge, A. J. (2014), Social relationships affect dispersal timing revealing a delayed infanticide in African lions. Oikos, 123: 1049–1056. doi:10.1111/oik.01266.

Fryxell, J.M., Mosser, A., Sinclair, A.R.E and Packer, C. 2007. Group formation stabilizes predator–prey dynamics. Nature 449, 1041-1043.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(1):219–229.

Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undermining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org/10.1371/journal.pone.0029332.

A. J. Loveridge, A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016). Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016). Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area – Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.com/environment/2016/jan/06/zimbabwe-plans-to-sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321–328. doi:10.1890/070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, B., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salerno, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.1111/ele.12091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142–153. doi:10.1111/j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. 2006. Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991). Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219–230. doi:10.1111/j.1523-1739.1991.tb00127.x

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, O., Hardy, O., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications of landscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion (*Panthera leo*) social organization in a human affected landscape. 2010.

Traill, L., Brook, B., Frankham, R., Bradshaw, C. (2010). Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 2010, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita*. 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non-Detriment Findings for Panthera leo in Zimbabwe.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.d.

36A Townsend Road

Suburbs

Bulawayo
Zimbabwe
Tel: +263 9 231329 Fax: +263 9 231329
Email: nengasha@gatorzw.co.uk or kaluga@yoafrica.com

Application To US FWS For Importation Of Trophy Lion From Zimbabwe.

Area of hunt – Deka Tail Safari Area. This is a Zimbabwe National Parks and Wildlife safari area which Nengasha Safaris has a 10 year lease. The area has a 50km boundary with Hwange National Park. At present we have 2 trophy lions on hunting quota.

Income from the lion hunts contributes a major percentage of the total turnover to the safari operation. We have a full time anti poaching team operating throughout the area at considerable expense. We have not only been able to control poaching but without doubt the numbers of wildlife in the area have increased considerably over the past 7 years.

We have also invested in better water supplies , improved roads and fire breaks. In summary the area is well managed with good conservation practices in place.

We also work closely with National Parks at Sinamatella and assist them with fuel and transport to deploy their scouts both in the Park and in the adjoining safari areas.

Simply put without income from lion hunting we would be forced to curtail our anti poac-hing operations and this would be extremely detrimental to wildlife populations in the area. Without control in an area the wildlife can be destroyed quickly – within 2 years it would be decimated.

In summary it is paramount we are able to market and export trophy lion into the USA in the interests of conservation. Wildlife only survives in Africa if it has a value placed on it –

Attachment E. 5. d. 4 pages

we would therefore request you consider this application to import a trophy lion from our area into the USA in a favourable light.
Please find attached our hunting permit for this year reflecting the 2 lion on quota. Once permits are issued for next year we can furnish you with them.
Regards
Paul Bennie.

010 000977

NP/CITES Form 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PCA: .....
PCA 100
Amount paid $250
Rec No. H10R067214
Date 23/01/17

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*].

to .....Nengasha Safaris.....

of .....Deka Tail Safari Area.....

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section .....Deka Tail Safari Area..... of the .....Mat North.....

..... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-17 and 31-12-17

Animal	A	B	Animal	A	B	Animal	A	B
Baboon	✓	20	Guinea fowl	✓	150	Pigeons/ Doves	✓	150
Buffalo male	✓	6	Girraffe (m)	✓	1	Porcupine	✓	2
Bushbuck m	✓	3	Impala(f)	✓	10	S. Hyena	✓	3
Bushig	✓	2	Impala(m)	✓	10	Sandgrouse	✓	50
Civet	✓	1	Jackal	✓	2	Serval	✓	1
Duiker	✓	3	Klipspringer (m)	✓	3	Waterbuck (m)	✓	1
Elephant (m)	✓	3	Kudu (f)	✓	3	Warthog (m)	✓	4
Francolin	✓	150	Kudu (m)	✓	8	Wildcat	✓	2
Genet	✓	2	Leopard (m)	✓	1	XXXXXXXXXXXXXXXXXXXXXX		
Grysbok(m)	✓	5	Lion (m)	✓	2			

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

.....
for and on behalf of the Director General, *Parks and Wild Life Management Authority*

(Designation .....)

.....
for *Finance Manager*

.....
for and on behalf of the Director General, *Parks and Wild Life Management Authority*

(Designation ..... A/ DIRECTOR - GENERAL)

Date stamp of authority which issue the permit

P.O. BOX

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SPORT HUNTING QUOTA FOR 2017

DEKA TAIL SAFARI AREA

Area: 121km2

SPECIES	PREVIOUS QUOTAS										TOTAL QUOTA	
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Baboon(m)	45	45	45	45	45(fourty five)	45(fourty five)	45(fourty five)	20(twenty)	20(twenty)	20(twenty)	20(twenty)
Buffalo(f)	4	4	4	4	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Buffalo(m)	8	8	8	8	8(eight)	8(eight)	8(eight)	6(six)	6(six)	6(six)	6(six)
Bushbuck(m)	3	3	3	3	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Bushpig	7	7	7	7	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Civet	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Duiker	9	9	9	9	9(nine)	9(nine)	9(nine)	3(three)	3(three)	3(three)	3(three)
Eland(m)	0	0	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Eland(f)	5	5	5	5	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Elephant (m)	4	4	4	4	4(four)	4(four)	3(three)	3(three)	3(three)	3(three)	3(three)
Elephant (f)	150	150	150	150	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)
Francolin	2	2	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Genet	5	5	5	5	5(five)	5(five)	5(five)	5(five)	5(five)	5(five)	5(five)
Geyshok(m)	150	150	150	150	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)
Guinea fowl	0	0	0	0	0(zero)	0(zero)	1(one)	1(one)	1(one)	1(one)	1(one)
Giraffe (m)	20	20	20	20	20(twenty)	20(twenty)	20(twenty)	20(twenty)	20(twenty)	10(ten)	10(ten)
Impala (f)	20	20	20	20	20(twenty)	20(twenty)	20(twenty)	20(twenty)	10(twenty)	10(ten)	10(ten)
Impala (m)	6	6	6	6	6(six)	6(six)	6(six)	6(six)	1(two)	2(two)	2(two)
Jackal	3	3	3	3	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Klipspringer (m)	4	4	4	4	4(four)	4(four)	3(three)	3(three)	3(three)	3(three)	3(three)
Kudu (f)	8	8	8	8	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)
Kudu (m)	3	3	3	3	3(three)	3(three)	2(two)	2(two)	2(two)	2(two)	2(two)
Leopard (m)	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	2(two)	2(two)
Lion(m)	150	150	150	150	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)	150(hundred&fifty)
Pigeons/Doves	2	2	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Porcupine	10	10	10	10	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	5(three)
Hyaena Spotted	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	0(zero)
Sable(m)	50	50	50	50	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)	50(fifty)
Sandgrouse	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Serval	0	0	0	0	0(zero)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Waterbuck (m)	7	7	7	7	7(seven)	7(seven)	7(seven)	4(four)	4(four)	4(four)	4(four)
Warthog(m)	2	2	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Wildcat	5	5	5	5	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Zebra											

ACTING CHIEF HYDROLOGIST

ACTING DIRECTOR CONSERVATION

ACTING DIRECTOR GENERAL

HOARD CHAIRMAN

SECRETARY FOR ENVIRONMENT WATER AND CLIMATE

HONISTER OF ENVIRONMENT WATER AND CLIMATE

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A FORCE FOR WILDLIFE CONSERVATION

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January 26, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD FEB 05 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant hunted in South Africa in November 2017. This lion was hunted in the APNR, which is designated as a "wild" lion population (see attached email). We respectfully request that this permit be approved subject to the FWS' consideration of positive enhancement information already provided by the Department of Environmental Affairs of South Africa.

The second applicant hunted in the Bubye Valley Conservancy in Zimbabwe. Bubye Valley and Conservation Force have submitted extensive documentation about this area. We respectfully request that you consider this information and the non-detriment findings and other information provided by Zimbabwe's Parks and Wildlife Management Authority in making a positive enhancement finding for this application.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Sign (b) (6) _____

Name: KEITH A. RIGGS

Date: 1/22/2018

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

RCVD FEB 05 2018

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Riggs	Keith	A	

3. Date of birth (mm/dd/yyyy)	4. Social Security No.	5. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Magnolia	Texas	77355	Montgomery	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 767644 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other [illegible] and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible] statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

[illegible]rmit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 1/17/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Bubye Valley Conservancy, Masvingo Province, Zimbabwe

   b. Date wildlife is to be hunted:

      June 11 - 28, 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      Skull and skin (full life sized skin including claws)

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
Address:	Belmont
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 1/22/2018

Be aware that there ma[redacted]quirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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RENEE SNIDER

June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

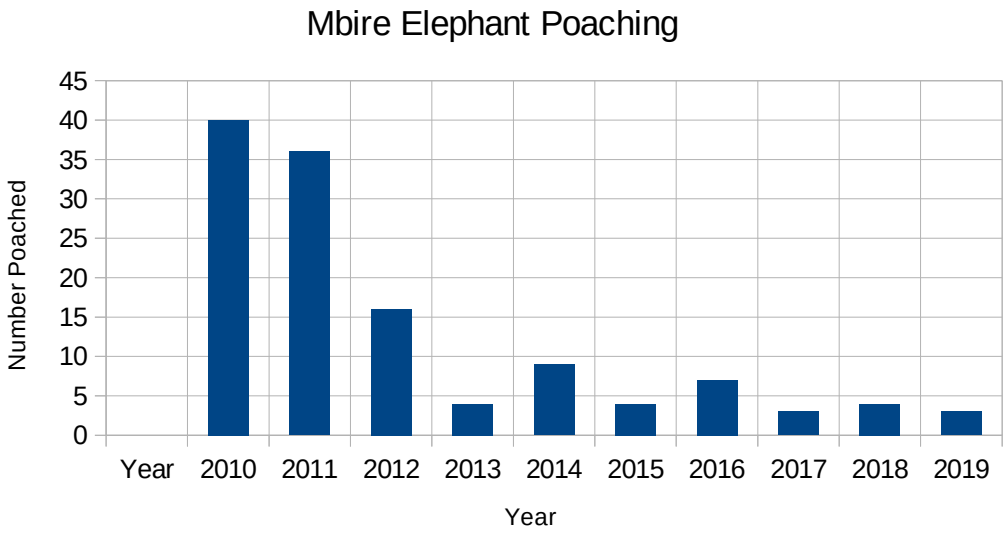

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

From: King, Jenna D
To: cf@conservationforce.org
Cc: Brisendine, Amy
Subject: CITES Permit Application #75286C
Date: Thursday, August 13, 2020 6:13:23 PM

Hello,

This email is in regard to the CITES permit application #75286C for Keith Riggs to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 6/11/2018 and 6/28/2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

United States Department of the Interior
FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE
Date: 2020.08.24 12:02:55 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

To: Permit File PRT- 75286C

JENNA KING Digitally signed by JENNA KING
Date: 2020.08.21 12:54:18 -04'00'

Enhancement Finding

Applicant: Keith A. Riggs (PRT– 75286C)

Introduction

Keith A. Riggs submitted an application, received by the Service on February 05, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken June 20, 2018, from the Bubye Valley Conservancy, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Keith A. Riggs hunted in the Bubye Valley Conservancy (BVC) in Zimbabwe. Based on information submitted with the permit application, the Bubye Valley Conservancy (BVC) is reportedly one of largest private wildlife areas in Zimbabwe with a total area of approximately 3,400 km^2. The land that now occupies BVC was historically a cattle ranch, and in 1994 the BVC was established and land use converted through the introduction of a variety of large, wild herbivores and with the primary objective of maintaining an ecologically sustainable and economically viable wildlife enterprise based on ethical trophy hunting.

In evaluating whether the importation of Mr. Riggs' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Bubye Valley Conservancy and Mr. Riggs himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Save Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species.

Sport hunting was essential for the successful transition of the BVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the

conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over US $100,000 per year. The BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but it is also empowered by job opportunities created both within these communities, as well as in the BVC (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Bubye Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Riggs' hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Riggs supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Riggs, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Riggs in the hunting and subsequent import of the trophy lion he harvested in the BVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Riggs' hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these

authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Riggs' trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr. Riggs' legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Riggs, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, reportedly, USD 590,000 was spent on anti-poaching efforts by BVC alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Riggs' legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Riggs submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Riggs plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Riggs' trophy lion increases the funds available to the Zimbabwe Government and BVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Riggs' permit request, we find that the expertise, facilities, or other resources available to Mr. Riggs appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Riggs' participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Riggs' permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Riggs on June 20, 2018, from the Bubye Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Keith A. Riggs of Magnolia, Texas.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The hushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 21, 2020

Telephone Number: 850-797-1095

JENNA KING Digitally signed by JENNA KING Date: 2020.08.21 12:56:03 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 75286C, Keith A. Riggs, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requested U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.24 12:04:19 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000080459
TREATMENT_DATA_SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Mazunga Safaris (Pvt) Ltd	**Client's Full Name**	KEITH A RIGGS
ZTA (HOP) No.	HOP0062	**Passport Number**	498202827
		Country of Issue	UNITED STATES
Address	Bubye Valley Conservancy 8 Norfolk Road P O Box 9169, Hillside, Bulawayo	**Address**	(b) (6) AGNOLIA, TEXAS 77355, USA
Name of Professional Hunter	M NEL	**Licence No.**	264
Telephone		**Fax**	NIL

Number of Accompanying Guests	0
Are the trophies being exported after tanning and mounting?	Yes
Are the trophies being exported after primary treatment?	Yes

Name of Processing Agent or Taxidermist	COLLETTS WILDLIFE ARTISTRY	**Address**	15 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Shipping Agent	FREIGHT CONSULTANTS	**Address**	3 TROJAN STREET BELMONT, BULAWAYO
Name of Foreign Agent	TRACY SAFARI ADVENTURES	**Address**	5424 SUNOL BOULEVARD #10 STE 235, PLEASANTON CA 94566 USA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Bubye Valley Conservancy	Masvingo	
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15			

ZIMBABWE REVENUE AUTHORITY
REVENUE OFFICE
12 JUL 2018
ZPWMA
Date Stamp
P.O. BOX 599 BULAWAYO

Date of Safari From	11-06-2018
Date of Safari To	29-06-2018
Daily Rate Charged For Big Game USD	3,000.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

3. DETAILS OF DEPOSITS

(All Inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	27-MAR-2018	DMS/15635	29-AUG-2018	USD	105,774	6,023.01
2	05-APR-2018	DMS/15635	29-AUG-2018	USD	105,774	79,011
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	54,000 00	**Total Guests rate**	.00
Less Commission	20,740.00	**Total Trophy fees**	49,700.00
Other fees (Incidentals)	2,074.00	**Grand Total USD**	85,034.01
Percentage Commission Charged	38.41	**Total Processing Fees**	5,497 00

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	IMPALA	M	Killed	Bubye Valley Conservancy	36K 852 868	23-JUN-2018	53	300
2	IMPALA	M	Wounded	Bubye Valley Conservancy	36K 568 081	24-JUN-2018	N/A	300
3	ZEBRA	F	Killed	Bubye Valley Conservancy	36K 377 095	19-JUN-2018	N/A	1,100
4	WILDEBEEST	M	Killed	Bubye Valley Conservancy	36K 970 083	19-JUN-2018	85	1,000
5	GIRAFFE	M	Killed	Bubye Valley Conservancy	36K 584 998	11-JUN-2018	N/A	1,800
6	GIRAFFE	M	Killed	Bubye Valley Conservancy	36K 020 053	13-JUN-2018	N/A	1,800
7	LION	M	Killed	Bubye Valley Conservancy	36K 077 017	20-JUN-2018	27 1/2	42,000
8	WARTHOG	M	Killed	Bubye Valley Conservancy	36K 412 082	16-JUN-2018	34	600
9	BUSH PIG	M	Killed	Bubye Valley Conservancy	36K 092 164	25-JUN-2018	N/A	650
10	JACKAL	M	Wounded	Bubye Valley Conservancy	36K 093 949	22-JUN-2018	N/A	150
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Collett's Wildlife Artistry
TAXIDERMIST
15 Josiah Chinamano Road, Belmont
PO Box 9067 Hillside
Bulawayo
Zimbabwe, Africa
Cell: +263 712 220 966
Phone: +263 292 885 868/ +263 292 885 349
Email: office@collettswildlifeartistry.com
www.collettswildlifeartistry.com

Client: Keith A. Riggs
(b) (6)
TX 77355
U.S.A.

Email: keithariggs@yahoo.com

Operator: Mazunga
Hunter: Martin Nel
TRAS2 #: 80459
Invoice #: 1191

Date: 4.4.19
P0518

Pretan Invoice

TROPHY	ITEM	INSTRUCTIONS	COST
Giraffe	Flatskin	Fur tan with carpet backing and brown bovine leather binding	1,955.00
	Skull	Dip and pack	60.00
Giraffe	Flatskin	Fur tan with carpet backing and brown bovine leather binding	1,955.00
	Skull	Dip and pack	60.00
Zebra	Flatskin	Fur tan with carpet backing and black bovine leather binding	850.00
Bushpig	Skull /Cape /Backskin /Tusks x 4	Dip and pack	105.00
Warthog	Skull /Cape /Backskin /Tusks x 4	Dip and pack	105.00
Impala	Skull/Cape/Backskin	Dip and pack	95.00
Wildebeest	Skull/Cape/Backskin	Dip and pack	115.00
		Paperwork	200.00
		Crating	175.00
		Less commission	(624.00)
		TOTAL USD	**5,051.00**

12 JUL 20

2% govt levy USD24600
Clearing fee USD200.00

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4513/2019

NP CITES FORM 2

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

Permit/Certificate No ZW/4513/2019

- [x] Export
- [ ] Re-Export
- [ ] Import
- [ ] Other

Original

2. Valid Until: 10/11/2019

3. Importer (name and address): KEITH A RIGGS

(b) (6) [redacted]
MAGNOLIA
TX 77355
U.S.A

3a. Country Of Import: United States Of America

4. Exporter (name, address and country Zimbabwe
COLLETTS WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse): H

5b. Security stamp no. 152715

6a. Declaration by Exporter or Agent
I hereby declare that I am aware of the provision of the Convention contained in the *Statutory Instrument 76 of 1998*, for the purpose of Exporting / Re- exporting / Importing the Wildlife listed below.
The total value of this consignment is:
$US 12,301.00 Signature of applicant.

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife
Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Connochaetes taurinus	Blue wildebeest	backskin : dip & pack	NE W	1 no	n/a		n/a
Connochaetes taurinus	Blue wildebeest	skin pieces : cape dip & pack	NE W	1 no	n/a		n/a
Connochaetes taurinus	Blue wildebeest	skulls : dip & pack	NE W	1 no	n/a		n/a
potamochoerus larvatus	bushpig	backskin : dip & pack	NE W	1 no	n/a		n/a
potamochoerus larvatus	bushpig	skin pieces : cape dip & pack	NE W	1 no	n/a		n/a
potamochoerus larvatus	bushpig	skulls : dip & pack	NE W	1 no	n/a		n/a
potamochoerus larvatus	bushpig	tusks : dip & pack	NE W	4 no	n/a		n/a

12. Country of origin:	Permit No	Date of issue	12a. Country of last re-export	Certificate No	Date:

13. This permit is issued by

Place: Bulawayo Date: 10/05/2019 Security stamp, signature and official seal:

PERMITS DIVISION
ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
04 JUN 2019
15271
WESTERN REGION
P.O. BOX 2283 BULAWAYO
TEL: 09 74000 FAX: 883386

14. Exchange Control Information
CD1 number 888541 or
CD1 not applicable to export (delete)

(Date stamp and signature of authorized official):
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority Inspector

106 12 JUL 2019

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity
Blue wildebeest backskin	1	bushpig skulls	1
" skin pieces	1	" tusks	4
" skulls	1		
Bushpig backskin	1		
" skin pieces	1		

17. Bill of landing/Air waybill number:

Port of export

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
INSPECTORATE
04 JUL 2019
Date
P.O. BOX 2283
BULAWAYO - ZIMBABWE
TEL. (09) 63641 7/74000

Signature

11320

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4514/2019

VP CITES FORM 2

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

Permit/Certificate No ZW/4514/2019

- [x] Export
- [ ] Re-Export
- [ ] Import
- [ ] Other

Original

2. Valid Until: 10/11/2019

3. Importer (name and address): KEITH A RIGGS

(b) (6) [redacted]
MAGNOLIA
TX 77355
U.S.A

3a. Country Of Import United States Of America

4. Exporter (name, address and country Zimbabwe
COLLETTS WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse) : T

5b. Security stamp no. LS2 7196

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife
Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

6a. Declaration by Exporter or Agent

I hereby declare that I am aware of the provision of the Convention contained in the *Statutory Instrument 76 of 1998*, for the purpose of Exporting / Re- exporting / Importing the Wildlife listed below, .
The total value of this consignment is:
$US .....Signature of applicant.....

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Giraffa camelopardalis	Giraffe	*skulls : dip & pack*	NE W	2 no	n/a		n/a
Giraffa camelopardalis	Giraffe	*skins : canned & bovine leather binding*	NE W	2 no	n/a		n/a
Aepyceros melampus	Impala	*backskin : dip & pack*	NE W	1 no	n/a		n/a
Aepyceros melampus	Impala	*skin pieces : cape dip & pack*	NE W	1 no	n/a		n/a
Aepyceros melampus	Impala	*skulls : dip & pack*	NE W	1 no	n/a		n/a
Phacochoerus africanus	Warthog	*backskin : dip & pack*	NE W	1 no	n/a		n/a
Phacochoerus africanus	Warthog	*skin pieces : cape dip & pack*	NE W	1 no	n/a		n/a

12. Country of origin:	Permit No	Date of issue	12a. Country of last re-export	Certificate No	Date:

13. This permit is issued by

Place: Bulawayo **Date:** 10/05/2019 Security stamp, signature and official seal

PERMITS DIVISION
ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
04 JUN 2019

14. Exchange Control Information
CD1 number..... 888541 ...../or
CD1 not applicable to export (delete)

(Date stamp and signature of authorized official):.....
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority Official

ZIMBABWE REVENUE AUTHORITY
P.O. BOX 2283 BULAWAYO
TEL: 09 74006 FAX 09 883386
12 JUL

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity
Giraffe Skull	2	Warthog backskin	1
Giraffe skins	2	Skin pieces	1
Impala backskin	1		
Skin pieces	1		
Skulls	1		

17. Bill of landing/Air waybill number:

Beit Bridge
Port of export

Date 04 JUL 2019

Signature

ZIMBABWE
11201

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4515/2019

IP CITES FORM 2

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

Permit/Certificate No ZW/4515/2019

- [x] Export
- [ ] Re-Export
- [ ] Import
- [ ] Other

Original

2. Valid Until: 10/11/2019

3. Importer (name and address): KEITH A RIGGS

(b) (6) [redacted]
MAGNOLIA
TX 77355
U.S.A

3a. Country Of Import: United States Of America

4. Exporter (name, address and country Zimbabwe
COLLETTS WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse): H

5b. Security stamp no. IS27197

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife
Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

6a. Declaration by Exporter or Agent

I hereby declare that I am aware of the provision of the Convention contained in the *Statutory Instrument 76 of 1998*, for the purpose of Exporting / Re- exporting / Importing the Wildlife listed below.
The total value of this consignment is:
$US .....Signature of applicant.....

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Phacochoerus africanus	Warthog	skulls · dip & pack	NE W	1 no	n/a		n/a
Phacochoerus africanus	Warthog	tusks · dip & pack	NE W	4 no	n/a		n/a
Equus burchelli	Zebra	skins · tanned & bovine leather binding	NE W	1 no	n/a		n/a

12. Country of origin:	Permit No	Date of issue	12a. Country of last re-export	Certificate No	Date:

13. This permit is issued by

Place: Bulawayo Date: 10/05/2019 Security stamp, signature and official seal:

PERMITS DIVISION
ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
04 JUN 2019

14. Exchange Control Information
CD1 number 838541 /or
CD1 not applicable to export (delete)

(Date stamp and signature of authorized official):
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority Inspector

ZIMBABWE REVENUE AUTHORITY
WESTERN REGION
P.O. BOX 2283 BULAWAYO
TEL: 09 74000 FAX: 09 883386
12 JUL 2019

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity
Warthog Skulls	1		
" Tusks	4		
Zebra Skins	1		

17. Bill of landing/Air waybill number:

Port of export: Beit Bridge

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
INSPECTORATE
04 JUL 2019
P O Box 2283
BULAWAYO ZIMBABWE
TEL (09) 74000

Date

Signature

11000

From: Aimee Korver
To: John J. Jackson, III; King, Jenna D; John Jackson, III
Subject: [EXTERNAL] Re: Fwd: FWS Permit Applications #78386C, 78392C, and 75286C
Date: Friday, August 21, 2020 11:26:45 AM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. King,

Attached you will find the hunting permits for Mr. Riggs Prt # 75286C.

He took the lion on June 20th, 2018.

I am still getting confirmation on Mr. Jahde's import permit application - he did not take a lion, but I need to confirm with him if he wants to withdraw his applicaiton.

Mr Campagna - I will have the information later today to submit- he will be forwarding me his hunting permits with the confirmed date of hunt- which I will forward to you.

Thank you for following up with me regarding the inquiries. I truly appreciate it.
Let me know if you have any other questions.

Kindest Regards,
AiméeKorver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

rg>
>
>
>
> Hello,
>
> I realize that I have sent you quite a few information requests
> recently, and I am still awaiting a response on the following three
> applicants. I wanted to reach out again in case the emails I sent prior
> got buried.
>
> 78386C, Jeffrey Campagna, hunted in June/July 2018, need specific date
> of hunt
>

> 78392C, Eric Jahde, hunted in October 2018, need specific date of hunt
>
> 75286C, Keith Riggs, hunted in June 2018, need specific date of hunt
>
> Thank you and let me know if you have any questions.
>
> Jenna King
> U.S. Fish and Wildlife Service
> International Affairs, Division of Management Authority
> Branch of Permits
> 5275 Leesburg Pike,MS: IA; 2W059D
> Falls Church, Virginia 22041
> https://www.fws.gov/international/permits/
> https://www.cites.or <https://www.cites.org/eng/disc/how.php>g
>

LION ZIMBABWE ESA TROPHY

Permit Number: MA75286C-0
Effective: 08/24/2020 Expires: 08/23/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.08.26 09:04:17 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KEITH A. RIGGS
(b) (6)
MAGNOLIA, TX 77355
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

January 26, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD FEB 05 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant hunted in South Africa in November 2017. This lion was hunted in the APNR, which is designated as a "wild" lion population (see attached email). We respectfully request that this permit be approved subject to the FWS' consideration of positive enhancement information already provided by the Department of Environmental Affairs of South Africa.

The second applicant hunted in the Bubye Valley Conservancy in Zimbabwe. Bubye Valley and Conservation Force have submitted extensive documentation about this area. We respectfully request that you consider this information and the non-detriment findings and other information provided by Zimbabwe's Parks and Wildlife Management Authority in making a positive enhancement finding for this application.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Stone	Gregory	Ralph	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)	NA	NA	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	NA

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Reno	NV	89511	Washoe	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
same as above

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 10US18492A/9 No ☐

3. (b) (6) regulations contained in *Title 50, Part 13 of the Code of Federal Regulations* and the other ...y that the information submitted in this application for a permit is complete and accurate to the ...t herein may subject me to the criminal penalties of 18 U.S.C. 1001.

12/20/2017
...o photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo melanochaita

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      Republic of South Africa, Limpopo, Lat: 24;9;23.00999/Long: 30; 51; 23.02000/Farm Excellence/Phalaborwa

   b. Date wildlife was hunted:

      11/25/2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Fullskin, complete skull-teeth, flying bones, claws

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Lifeform Taxidermy, 7 Aluminum St, ext 8, white river, 124G, Republic of South Africa

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Life Form Taxidermy
Business Name:	Life Form Taxidermy
Address:	7 Aluminum St, EXT 8
Address:	
City:	White River
State/Province:	
Country, Postal Code:	Republic of South Africa, 124G

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if ap[redacted]ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) _____ Date: 12/20/2017

Be aware that there ma[redacted]ements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

   same as listed on page 1

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

    Conservation Force/3240 S. I-10 Service Road W, Suite 200
    Metairie, Lousiana 70001 USA (504) 837-1233 CF@CONSERVATIONFORCE.ORG

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: Gregory R Stone

Date: 12/21/17

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No. 30104

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 23 / 11 / 2017 Terminated 28 / 11 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: Ian Brown

Business Address: Farm Excellence Hoedspruit

Code: 1380

ID No: 7403075072086

PH Permit No: ZA/LP/82739

Date: 28/11/2017 Signature:

CLIENT

Name: Gregory Ralph Stone

Permanent Postal Address: [redacted]

Reno Nevada Code: 89511

Country: USA Tel/Fax: [redacted]

Passport No: [redacted]

Email: [redacted]

Date: 28/11/2017 Signature:

HUNTING OUTFITTER

Name: Wayne Wagner Safaris

Business Address: Farm Excellence Hoedspruit Code: 1380

I.D. No: 7312125191087

Tel No 015 793 1925 Fax 015 793 2899

HO Permit No: ZA/LP/82287

Date: 28/11/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Excellence Kit 157	Mopani	W.E. Wagner	No. 10536	25/11	Lion	1		X	Full skin, Complete Skull + Teeth, Floating bones, claws

Address to which trophies are to be sent: Life Form Taxidermist, 7 Aluminium st, Ext 8, White River

Code: 1240 Country: RSA Trophy Export Date (Estimate): Unknown

Conservation Levy

Total:

Copies: Client Original White
1st Copy Pink Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter 2nd Copy Blue Retain for a period of three years
Taxidermist 3rd Copy Green Taxidermist
Professional Hunter Last Copy Yellow Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: South Africa Lion permit to US

3 messages

Greg Stone [redacted] Fri, Jan 19, 2018 at 3:21 PM
To: regina.lennox@conservationforce.org

Hi Regina
Just got this from the outfitter for my lion. Hope it helps with my application. Please let me know if there is more information I can provide. Have a nice weekend!
Greg

-sent from my iPhone

Begin forwarded message:

From: "Wayne & Tao Wagner" <wagnersafaris@yebo.co.za>
Date: January 18, 2018 at 5:41:02 AM PST
To: "'Greg Stone'" [redacted]
Subject: RE: South Africa Lion permit to US

Hi Greg,

Hope that you are well. It is no problem asking for information regarding the lion exportation, we would like to assist you where we can to export the lion trophy to the States.

I have attached a map that indicates the property (Farm Excellence) and the surrounding reserves, i.e. Balule Nature Reserve which are members of the APNR. You will notice that the Farm Excellence KT157 and Excellence's neighbour to the north west – Hoofpyn 269KT – are included on the map although the properties are not formally part of Balule. We have not reached an amicable agreement to join Balule but the properties are separated only by the Olifants River giving the wild lions free roam of the reserves and the two properties as mentioned above.

A part of Excellence is unfenced with Balule Nature Reserve (APNR) and the remaining portion of Excellence & Hoofpyn are fenced but the wild lions roam freely over all these properties. There is a blacktop road to the west of Excellence and Hoofpyn that basically forms the borders of the APNR. The same wild lions that roam Balule Nature Reserve and the APNR roam on Excellence and Hoofpyn.

I again confirm that the lion permit applied for on the Farm Excellence & Hoofpyn was a exportable lion and not a DCA permit.

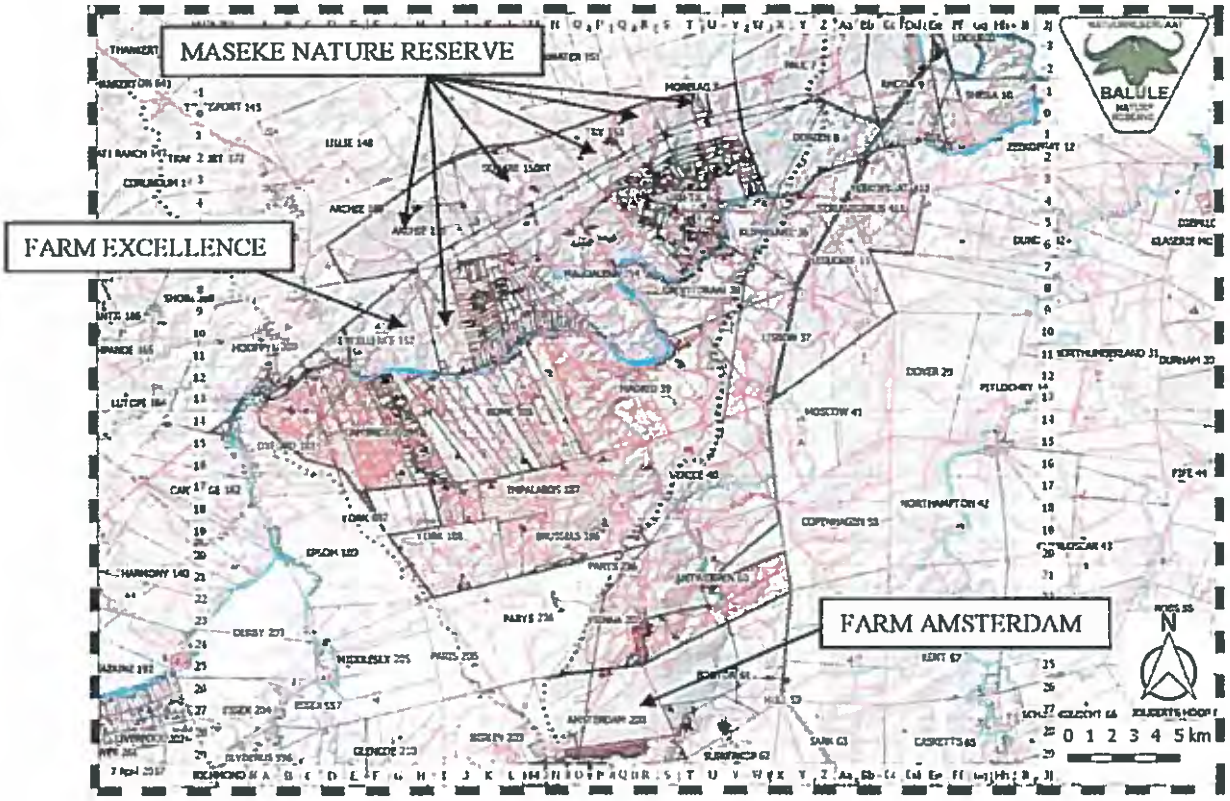
I hope that this is helpful, please let me know if there is anything else we can assist you with.

Kind Regards
Wayne Wagner

This email has been checked for viruses by AVG antivirus software.
www.avg.com

GREG STONE LION EXPORT MAP.pdf
414K

APPENDIX A: NEW AREAS INCLUDED INTO BALULE NATURE RESERVE THAT REQUIRE VELD CONDITION ASSESMENT AND SURVEY AS PER APNR ROUTINE.



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ahern	James	Lyon	Jr.

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Alpine	TX	79830	Brewster	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Alpine	TX	79831	Brewster	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☐

(b) (6)

egulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other
that the information submitted in this application for a permit is complete and accurate to the
herein may subject me to the criminal penalties of 18 U.S.C. 1001.

2/1/18

hotocopied or stamped signatures) Date of signature (mm/dd/yyyy)

ontinue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Lion, Panthera Leo

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe, Matetsi 4, Controlled by National Parks, Victoria Falls, Zim

   b. Date wildlife is to be hunted:

      July 21st – Aug 10th 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      life size mount

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Richard Cooke
Business Name: Richard Cooke Safaris (25 years in business)
Address: representing: Power Zimbabwe (PVT) LTD (holder of operator license)
Address: 653 reynaid road
City: Victoria Falls
State/Province:
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States,

(b) (6) [redacted] Date: 2/1/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

James L. Ahern, (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

James L. Ahern, Jr.

Dear Jim,

I was great to meet you @ the show this year. Thank you for fielding all the questions from Richard and I. We are both very interested in anything that has to do with the outdoors. Please let this letter serve as additional information for #5 in the federal Wildlife Permit Application included in this envelope. As you know the area I am applying for (Matetsi) was involved in a 5 yr. moratorium on Lion hunting while a study was conducted. The findings of this study by "Wild Cru" was that Lion populations in Zimbabwe and more specifically in the Matetsi areas along with Wange National Park and the surrounding Forestry areas is on the increase. Further, a finding of the study was that the 5 yr moratorium was not needed and that now they may have more Lions than the area can actually support without harming the other wildlife. I personally hunted in Matetsi 5 in 2017 and saw 2 males, 7 female, 3 cubs in only 3 days of being there. The man that runs Swarovski Optik USA told Richard and I that he filmed 50-80 Lions in a 10 day hunt that occurred in Matetsi 3 in 2017. The Matetsi areas 1-7 are considered to be the highest concentration Lion Population in Zimbabwe. The National Park team monitors the age on any Lion taken in the area and will reduce an areas quota if a Lion is taken under 5 yrs old. The area I am applying for has 1 Lion on quota for 2018 (Matetsi 4). Part of the $25,000 trophy fee I will pay goes to National Parks to improve the habitat

for Lion. With the money they will dig bore hole
or water wells to provide more water for the
Lions. They will also build fire breaks with motor
graders to prevent the Lions habitat from burn
destroyed by wildfire that so often occurs in th
area. The final thing they use the money for is anti
poaching efforts which benefit all wildlife in this
great area. These three conservation efforts are considered
to be the most effective ways to help the African Lion.

I personally have helped Lion conservation efforts in Tanz
by buying 2 hunts that included 21 days with a Lion permit
I didnot take a Lion on either hunt so if allowed to hunt
this area in Zimbabwe I will have paid considerable mone
to help the African Lion. I have never had a game violation
in either the United States or Africa and have been hunti
since I was 6 years old. I am 42 years old on Feb 15, 201

Richard Cooke has been in business 25 years and his ultim
life is fishing, hunting, and conservation of the fish and game
hunts. Richard has a perfect record and has never had a violation
of a game law in either Africa or the United States.

Please consider me for a US Fish and Wildlife Service CI
permit for the great African Lion. My Best,

OTHER THAN THE DESIGNATED AND INTENDED RECIPIENT(S) IS UNAUTHORIZED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE DELETE IT FROM YOUR SYSTEM IMMEDIATELY.

[Quoted text hidden]

James Ahern <james@ahernranches.com> Wed, Aug 15, 2018 at 5:16 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Hi Anna! I am home from Africa and got my Lion! It was awesome and the Lion research people aged him at 9 years old. The perfect old guy. I was wondering if my permit would be issued soon so I can get him home?
My very best, James Ahern

James L. Ahern, Jr. Ranch Broker
Ahern Ranches
Po Box 153
Alpine, Tx 79831
210-827-0505
210-568-4903 fax
www.ahernranches.com
james@ahernranches.com

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[Quoted text hidden]

James Ahern <james@ahernranches.com> Mon, Sep 10, 2018 at 11:55 PM
To: "Barry, Anna" <anna_barry@fws.gov>(b) (6)

Hello Ms. Barry-
I am just checking in to see if my status for my permit has made any progress? I am including Mrs. Haywood on this email as she my only friend in the DC area and may be able to help liaise on this issue. Hopefully she can be of help since she is in government and knows me well. Thank you for your time and consideration in this matter.
My best, James Ahern

James L. Ahern, Jr. Ranch Broker
Ahern Ranches
Po Box 153
Alpine, Tx 79831
210-827-0505
210-568-4903 fax
www.ahernranches.com
james@ahernranches.com

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[Quoted text hidden]

Janeiro Haywood (b) (6) Tue, Sep 11, 2018 at 12:10 PM
To: "Barry, Anna" <anna_barry@fws.gov>, James Ahern <james@ahernranches.com>

Hello Ms. Barry,

My name is Janeiro Haywood I work for NASA here at Goddard Space Flight Center. I can truly speak for Mr. Ahern character and his integrity. He is an honorable man let me first say. I have known him for over 8 years. He and his father have worked with my husband and I to secure property in Texas. At present we are working with nature to continue to allow wildlife to roam on our property. I hope you will approve his application expeditiously and grant him the permit that he desires. Mr. Ahern is an ethical and always will follow the regulations forth by your organization I am sure of that.

Thank you for your time in the matter and godspeed.

Janeiro Killebrew-Haywood

[Quoted text hidden]

Brisendine, Amy <amy_brisendine@fws.gov>

James L. Ahern, Jr PRT #76460C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, May 28, 2019 at 10:41 AM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>

FYI

Anna

---------- Forwarded message ---------
From: **James Ahern** <james@ahernranches.com>
Date: Sat, May 25, 2019 at 10:57 AM
Subject: [EXTERNAL] Re: James L. Ahern, Jr PRT #76460C
To: Barry, Anna <anna_barry@fws.gov>

Hi Anna! I was just wondering if you were making any progress on my permit? I heard y'all were going to start allowing some permits? Sincerely,
James

James L. Ahern, Jr. Ranch Broker
Ahern Ranches
Po Box 153
Alpine, Tx 79831
210-827-0505
210-568-4903 fax
www.ahernranches.com
james@ahernranches.com

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On May 2, 2018, at 3:45 PM, Barry, Anna <anna_barry@fws.gov> wrote:

> The application is still in "review" status.
>
> Sincerely,
>
> Anna Barry
> Senior Biologist

USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. **We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Sun, Apr 29, 2018 at 2:43 PM, James Ahern <james@ahernranches.com> wrote:

> Ms. Barry-
> Hi. I am checking the status of my permit for Zimbabwe? My trip will be here before we know it and I would love to have all my ducks in a row as soon as possible so I can make my final plans. Is there any way you can give me an update as to my status at this time?
> My best, James Ahern
>
> James L. Ahern, Jr. Ranch Broker
> Ahern Ranches
> Po Box 153
> Alpine, Tx 79831
> 210-827-0505
> 210-568-4903 fax
> www.ahernranches.com
> james@ahernranches.com
>
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On Mar 1, 2018, at 8:45 AM, Barry, Anna <anna_barry@fws.gov> wrote:

Dear Mr. Ahern,

Thank you for your quick response, I will contact you once I have been informed that it was received in our office.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Wed, Feb 28, 2018 at 7:19 PM, James Ahern <james@ahernranches.com> wrote:

> Ms. Barry,
> I can not believe I forgot to send the fee with my application. I will mail it this evening from Houston, TX. I will also send you another email with a picture of the check and the envelope used to mail the check to you. My apologies and my very best, James Ahern
>
> James L. Ahern, Jr. Ranch Broker
> Ahern Ranches
> Po Box 153
> Alpine, Tx 79831
> 210-827-0505
> 210-568-4903 fax
> www.ahernranches.com
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>
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On Feb 26, 2018, at 1:07 PM, Barry, Anna <anna_barry@fws.gov> wrote:

> Dear Mr. Ahern,
>
> I am currently processing your application to obtain an Endangered Species Import permit for an African lion trophy from Zimbabwe. To complete the application please provide the processing fee by submitting a $100 check or money order payable to U.S. Fish and Wildlife Service.
>
> *If the requested information is not received by this office by **April 13, 2018,** your application will be abandoned and administratively closed. Once a file is closed you will need to submit a new application and all required fees for the Service to consider your proposed activity.*
>
> Sincerely,
>
> Anna Barry
> Senior Biologist
> USFWS/Division of Management Authority
> Branch of Permits, MS: IA
> 5275 Leesburg Pike
> Falls Church, VA 22041-3803
> 1-800-358-2104, ext. 1976 or 703-358-1976
> Fax: 703-358-2281
> E-mail: Anna_Barry@fws.gov
>
> *Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.*
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> ***ALERT*** *You may have noticed that our **application forms expired 5/31/2017**. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***
>
> ***Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!***

Brisendine, Amy <amy_brisendine@fws.gov>

CITES/ESA import application 76460C (Mr. Ahern; lion trophy import from Zimbabwe)

1 message

Brisendine, Amy <amy_brisendine@fws.gov> Fri, Aug 16, 2019 at 4:46 PM
To: james@ahernranches.com
Cc: Amy Brisendine <amy_brisendine@fws.gov>
Bcc: Toni Wagner <Toni_Wagner@fws.gov>, Anna Barry <Anna_Barry@fws.gov>

Hi Mr. Ahern,

I apologize for the delay in processing your application, check dated February 28, 2018, received in our office on March 7, 2018 for a lion that you hunted in Zimbabwe. Please note that since March 1, 2018, in response to a D.C. Circuit Court opinion, the Service informed the public that we were revising our procedures for assessing applications to import certain sport-hunted species; the memo can be found here: https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf. The Service is now required to make findings for trophy imports on an application-by-application basis.

The Department of the Interior recognizes that well-managed hunting programs can contribute to the conservation of the hunted species. Therefore, the Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of these sport-hunted species and evaluate the information provided in the application as well as other information available to the Service regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

If you have additional information that you would like to add to your application file, please furnish it within 45 days (by September 30, 2019).

We will contact you when we have completed the review and processing of your application. Please feel free to contact me if you have any other questions, and again, I apologize for the delay in processing your application.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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January 31, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

FEB 9 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant will hunt in Namibia in July 2018. Namibia has a growing lion population, and some of the communal conservancies have accepted lion to increase available habitat and reduce human-lion conflict. This applicant is hunting in a communal conservancy supporting over 1,000 people.[1] We respectfully request that you consider the enclosed information on Namibia's conservancies and the information available on the NACSO website, www.nacso.org.na, as well as information received from the Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant is hunting in the Deka Safari Area in Zimbabwe in 2019. Deka is a state Safari Area, and his trophy fees and other fees will go to benefit lion management by funding the Zimbabwe Parks and Wildlife Management Authority. We respectfully request that you consider the information and the non-detriment findings provided by the Parks and Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

[1] http://www.nacso.org.na/conservancies/balyerwa-conservancy

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

FEB 9 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Jonathan Ulrich

Date: 01/23/2018

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

FEB 9 2018
Threatened - Listed Lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ulrich	Jonathan	E	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		(b) (6)	

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cleburne	TX	76033	Johnson	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicable parts in Subchapter B of Chapter I, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

1/29/18

Signature of applicant for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera Leo, Lion
      Melanochaita

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Namibia, Caprivi Strip, Balyerwa Conservancy, Katima Mulilo

   b. Date wildlife is to be hunted:

      Estimated July 19, 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      Life Size Mount

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	PH Jan Malonie or Gunter Schwalm
Business Name:	Balyerwa Conservancy
Address:	
Address:	
City:	Katima Malilo, Namibia
State/Province:	
Country, Postal Code:	9000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if ap[redacted] ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 1/29/18

Be aware that there ma[redacted]uirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le designated-ports.html If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Jonathan Ulrich
(b) (6) [redacted]
Cleburne, TX 76033

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, CF@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

19 Lossen Street
PO Box 98353
Windhoek
Namibia

Tel: +264 61 230888
Fax: +264 61 237036
nacso@iway.na

Share / Save

Balyerwa Conservancy

Region: Zambezi
Population: 1 091
Area km2: 223
Date registered: October, 2006
Address: PO Box 629, Ngweze
Telephone: 081-3630908
Geographical features: A mosaic of woodland and grassland. The average annual rainfall is 600 mm

Unusual or important features:
Kwando River, Mamili National Park on southern border and Mudumu National Park on northern border.

Major wildlife resources:
Elephant, hippo, kudu, buffalo, leopard, bush pig, duiker, warthog, black-backed jackal, lion, spotted hyaena, crocodile, plains zebra, interesting bird life, tiger fish, catfish, various tilapia fish species.

Management:
Management Committee of eight men and one woman; wildlife monitoring using annual count on foot and Event Book monitoring system.

Quick links

Ministry of Environment and Tourism (MET) website

MET regional offices

Photo Library

North West game count

NACSO full members

IRDNC

LAC

NDT

CCF

MRCC-UNAM

» See all NACSO members

NACSO partners

Funding partners

Hunting partners

Tourism partners

Government Agencies

Where we are

Location of...

Website by JARO Consultancy

Copyright © NACSO 2018,

the state of community conservation in Namibia

A summary of the annual report

2016

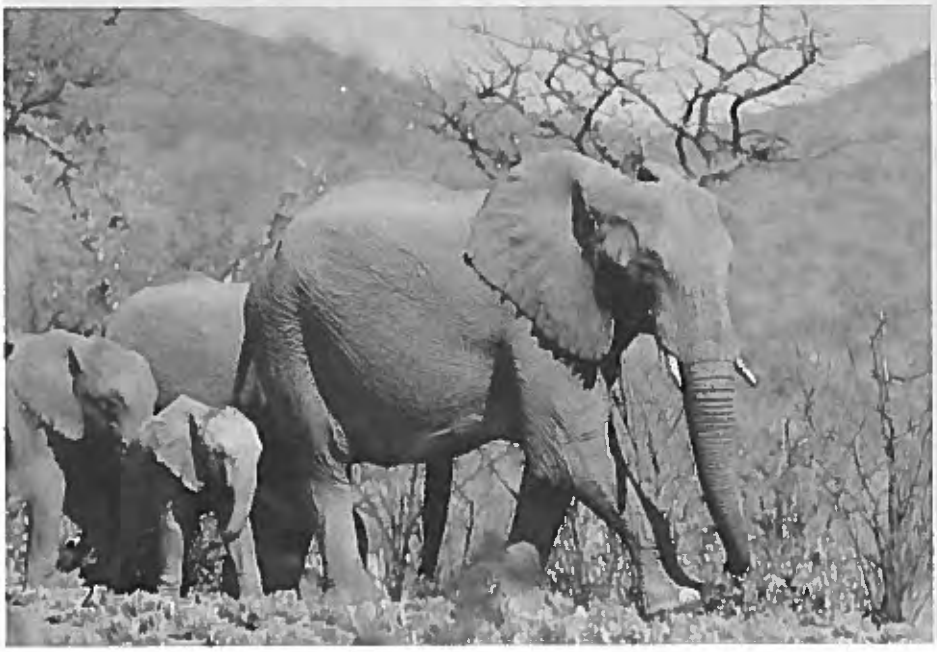
The full report may be downloaded at www.nacso.org.na and is available at the NACSO office in Windhoek

Living with wildlife

Community Conservation in Namibia

... means striving for balanced land use and a healthy environment. Wildlife — and all natural resources — can be utilized sustainably and integrated with other rural livelihood activities for the benefit of the people and the land...

Community conservation is about managing natural resources sustainably to generate returns for rural people. Conservancies, community forests and other community conservation initiatives create the necessary legal framework for this. By choosing to live with wildlife, rural communities are broadening their livelihood options as well as enabling a healthier environment. Through wise and sustainable management and use, natural resources are conserved for future generations while providing significant returns today.



Community conservation in Namibia

At the end of 2016 there were...

- 82 registered communal conservancies
- 1 community conservation association in a national park (Kyaramacan Association – managed like a conservancy)
- 19 concessions in national parks or on other state land held by 23 conservancies (some conservancies share concessions)
- 32 registered community forests
- and 2 community fish reserves

in Namibia

What's being achieved?

Community conservation...

- overs 165,182 km², which is about 52.9% of all communal land with an estimated 195,258 residents (another approximately 5,752 members of the Kyaramacan Association live in Bwabwata National Park)
- of this area, conservancies manage 162,030 km², which is 19.66% of Namibia
- community forests cover 30,828 km², 89.9% of which overlaps with conservancies
- community rangeland management areas cover 4,004 km², much of which overlaps with conservancies
- from the beginning of 1990 to the end of 2016, community conservation contributed about N$ 5.98 billion to Namibia's net national income
- during 2016, community conservation generated over N$ 111 million in returns for local communities
- community conservation facilitated 5,147 jobs in 2016
- 57 conservancies had a total of 164 enterprises based on natural resources
- community conservation supports wildlife recoveries and environmental restoration
- Namibia's elephant population grew from around 7,500 to around 22,800 between 1995 and 2016
- Namibia has an expanding free-roaming lion population outside national parks

The biggest challenges?

- countering the increasing threat from commercial poaching and trafficking of rhino and elephant parts
- countering international pressure to ban Namibia's legal consumptive use of wildlife
- increased local poaching due to drought
- countering growing financial mismanagement
- a levy imposed by the Ministry of Lands and Resettlement, which could render joint-venture lodges financially unviable
- award of prospecting and mining licenses without due consideration to biodiversity and social issues

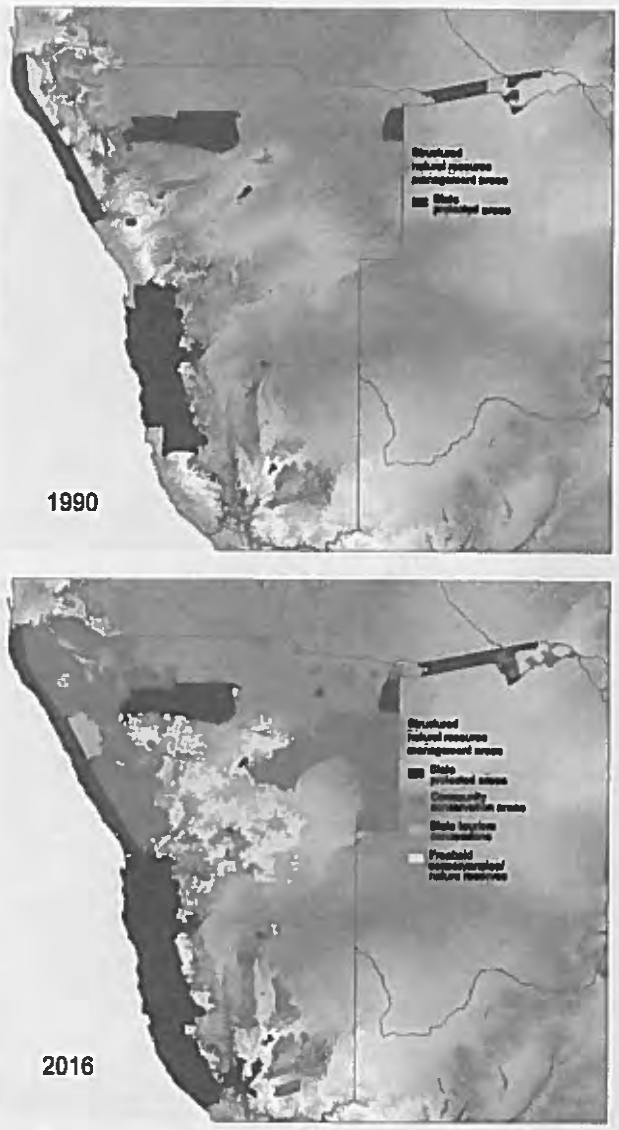
CBNRM

Community Based Natural Resource Management

The earliest community-based conservation initiatives in Namibia, which have today developed into a national CBNRM programme, started before independence when the first community game guards were appointed by local headmen in an attempt to reverse wildlife declines. At the time, wild animals were seen as little more than a threat to crops, livestock and infrastructure, and to community safety. Furthermore, people living in communal areas had been denied their traditional rights to utilize wildlife.

Ground-breaking legislation passed in the mid-nineties laid the foundation for a new approach to natural resource use. By forming legally-recognized community conservation organizations such as conservancies and community forests, people in communal areas can now actively manage natural resources and generate returns from them. This continues to encourage wildlife recoveries and environmental restoration.

The first conservancies were registered in 1998 and the first community forests in 2006. The Kyaramacan Association was founded in 2006 within Bwabwata National Park and is treated as a conservancy by NACSO. While community conservation organizations are resource management units and businesses, they are also defined by social ties uniting groups of people with the common goal of conservation.

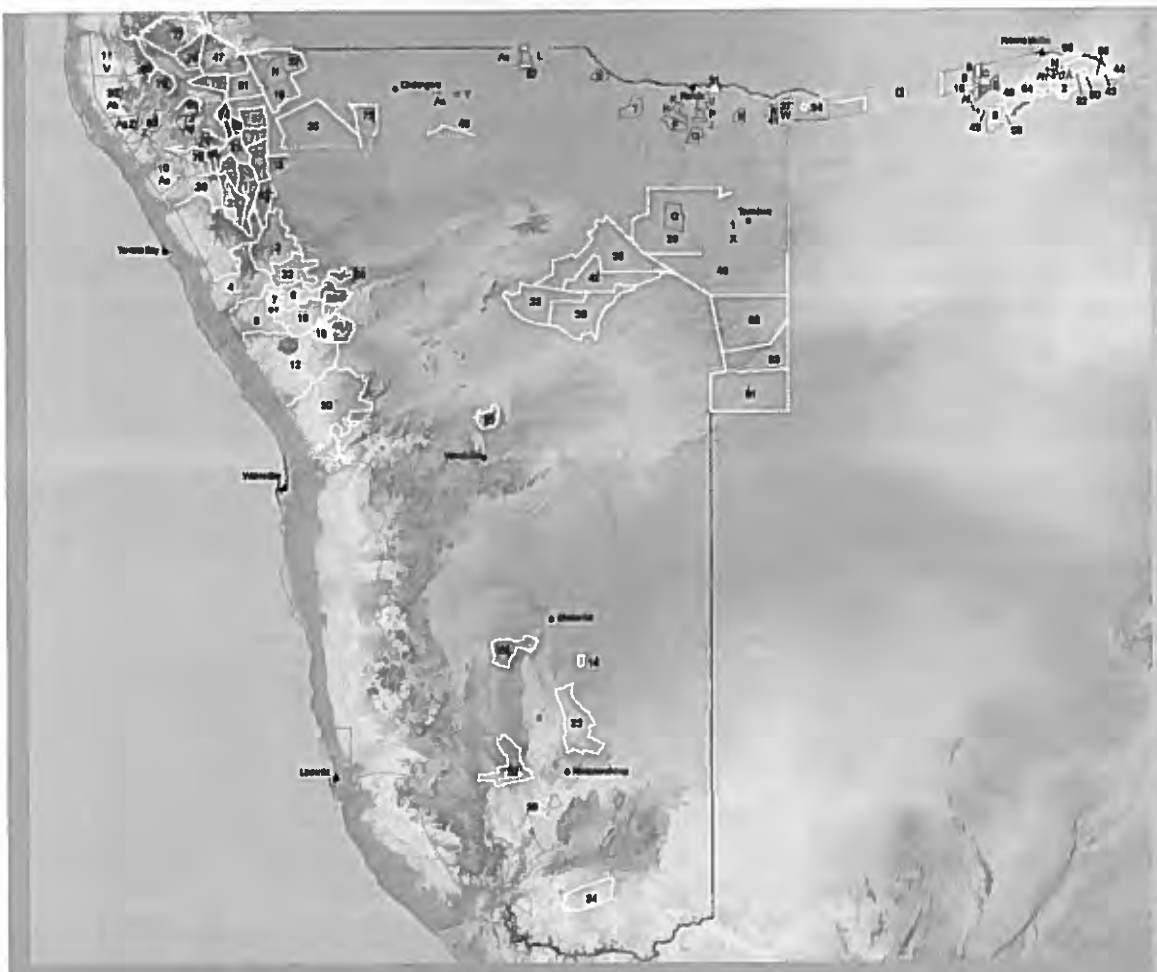


The expansion of structured natural resource management across Namibia

At independence in 1990, there were no registered community conservation areas, freehold conservancies did not exist, and a mere 12% of land was under recognized conservation management. At the end of 2016, land under structured natural resource management covered 43.7% of Namibia.

Front cover photo: Will Burrard-Lucas

The distribution of conservancies and community forests across Namibia
At the end of 2016, there were 82 registered communal conservancies and 32 registered community forests in Namibia and one community association in a national park, covering 165,182 km². [The lists below follow the chronological sequence of registration]



Conservancies

1 Nyae Nyae
2 Salambala
3 ǂKhoadi-//Hôas
4 Torra
5 Wuparo
6-7 Doro !nawas/ Uibasen-Twyfelfontein
8 Kwandu
9 Mayuni
10 Puros
11 Marienfluss
12 Tsiseb
13 Ehi-Rovipuka
14 Oskop
15 Sorris Sorris
16 Madhi
17 Omatendeka
18 Otjimboyo
19 Uukwaluudhi
20 Orupembe
21 Okangundumba
22 //Huab
23 !Khob !naub
24 //Gamaseb
25 Anabeb
26 Sesfontein
27 Sanitatas
28 Ozondundu
29 N≠a Jaqna
30 ǂGaingu
31 Joseph Mbambangandu
32 Uukolonkadhi Ruacana
33 Ozonahi
34 Shamungwa
35 Sheya Shuushona
36 !Gawachab
37 Mududva Nyangana
38 Otjituuo
39 African Wild Dog
40 King Nehale
41 George Mukoya
42 Okamatapati
43 Kasika
44 Impalila
45 Balyerwa
46 Ondjou
47 Kunene River
48 Ohungu
49 Sobbe
50 //Audi
51 Ovitoto
52 !Han /Awab
53 Okondjombo
54 Otjambangu
55 Eiseb
56 Sikunga
57 Okongo
58 Huibes
59 Dzoti
60 Otjitanda
61 Otjombinde
62 Orupupa
63 Omuramba ua Mbinda
64 Bamunu
65 !Khoro !goreb
66 Kabulebula
67 Okongoro
68 Otjombande
69 Ongongo
70 Ombujokanguindi
71 Otuzemba
72 Otjiu-West
73 Ilpumbu ya Tshilongo
74 Okatjandja Kozomenje
75 Ombazu
76 Okanguati
77 Epupa
78 Otjikondavirongo
79 Etanga
80 Nakabolelwa
81 Ombombo
82 Lusese

α Kyaramacan Association

6-7 Doro !nawas/ Uibasen-Twyfelfontein Joint Management Area

Community Forests

A Bukalo
B Hans Kanyinga
C Kwandu
D Lubuta
E Maslida
F Mbeyo
G Mkata
H Ncamegoro
J Ncaute
K Ncumcara
L Okongo
M Sikanjabuka
N Uukolonkadhi
P Guma
Q Gcwatjinga
R George Mukoya
S Kahenge
T Katope
U Likwaterera
V Marienfluss
W Muduva Nyangana
X Nyae Nyae
Y Ohepi
Z Okondjombo
Aa Omuntu Wekuta
Ab Orupembe
Ac Oshaampula
Ad Otjiu-West
Ae Puros
Af Sachona
Ag Sanitatas
Ah Zilitene

The benefits of community conservation

Community conservation has shown that it can improve rural lives while contributing to biodiversity conservation, and is recognized as a national development strategy. Many conservancies are showing that conservation can generate a broad range of community and individual returns (see graph) while covering their operational costs from their own income.

Community conservation can become fully sustainable and largely self-financing in the foreseeable future, provided that appropriate resources continue to be invested to entrench governance foundations, optimize returns, and mitigate threats and barriers to development.

Three pillars of community conservation in Namibia

Institutional development

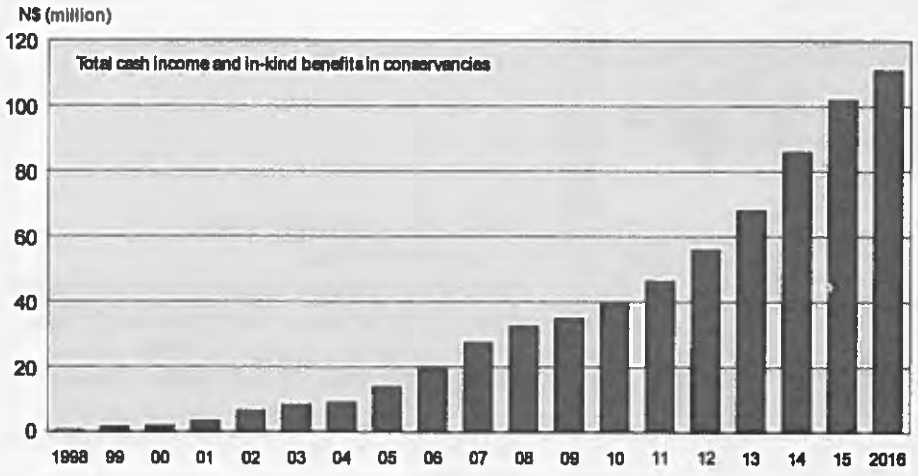
Good governance creates the basis for resource management and the equitable distribution of returns

Natural resource management

Innovative resource management enables biodiversity conservation and the sustainable use of wildlife and plant resources

Business, enterprises and livelihoods

Incentive-based conservation approaches enable an expanding range of rural livelihood options



Total returns to conservancies and members
The total cash income and in-kind benefits generated in conservancies (including the Kyaramacan Association) grew from less than N$ 1 million in 1998 to more than N$ 111 million in 2016. This includes all directly measurable income and in-kind benefits being generated, and can be divided into cash income to conservancies (mostly through partnerships with private sector operators), cash income to residents from enterprises (mostly through employment and the sale of products), and as in-kind benefits to residents (mostly the distribution of harvested game meat).

Building Foundations

...means creating structures that enable wise and effective governance which empower rural people to control their affairs and resources for a common, sustainable good...

Democratic, effective governance

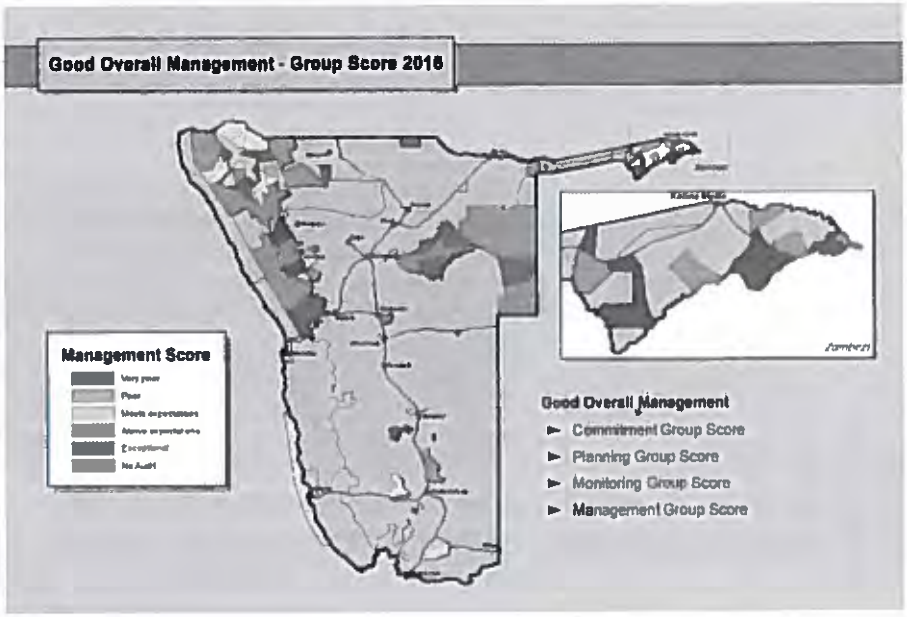
Resources can only be used sustainably if effective management structures exist to guide their use.

Before independence, rural communities were disenfranchised and the absence of a sense of ownership over resources led to their neglect and indiscriminate exploitation.

Conservancies, community forests and other legally recognized community conservation initiatives have created effective formal structures for democratically managing communal resources.

CBNRM, Community Based Natural Resource Management, is the basis of democratic control by local communities over natural resources and the distribution of benefits from them, usually through communal conservancies.

The Conservancy Chairperson's Forum is a national opportunity for conservancies to learn about issues and to exchange views, as well as to raise issue of concerns with senior officials from the Ministry of Environment and Tourism



Natural resource management performance ratings

Institutional development data is collected annually during integrated audits. Conservancies are rated for their commitment, planning, monitoring and management. Conservancies use the information to evaluate and improve their governance, and support organisations are able to provide targeted assistance.

Institutional development can take place without an office – Lusese is a newer conservancy, gazetted in 2014

Institutional development in conservancies in 2015

Order	Category	Status	Number of conservancies reporting	Percentage of category
1	Registered conservancies (incl. Kyaramacan assoc.)	83	83	100
2	Conservancies generating returns	62	83	75
3	covering operational costs from own income	28	46	61
4	distributing cash or in-kind benefits to members, or investing in community projects	38	46	83
5	Conservancy management committee members	950	78	100
6	female management committee members	370	78	39
7	female chairpersons	11	78	14
8	female treasurers/financial managers	32	78	41
9	Conservancy staff members	853	78	100
10	female staff members	245	78	29
11	Conservancies management plans	52	78	67
12	sustainable business and financial plans	15	78	19
13	Conservancy AGMs held	55	78	71
14	financial reports presented at AGM	52	78	67
15	financial reports approved at AGM	43	78	55
16	budgets approved at AGM	35	78	45

Conservancy management capacities fluctuate, influenced by staff and committee changes, as well as the degree of external support. Many conservancies have strong and growing female participation, and a substantial number of conservancies that used to be dependent on grant aid are now covering operational costs from their own income, with many also distributing benefits to members or investing in community projects.

Governance at a glance

At the end of 2016 there were...

- 52 management plans in place
- 15 sustainable business and financial plans in place
- 52 annual financial reports that had been presented
- 55 annual general meetings that had been held
- 15% female chairpersons
- 41% female treasurers/financial managers
- 39% female management committee members
- 29% female staff members

In communal conservancies in Namibia

What's being achieved?

Community conservation means...

- contributing to improved democracy in rural areas
- empowering individuals, including women, to actively participate in decision-making
- employing staff to manage a broad range of resources
- working according to management and benefit distribution plans
- unlocking human potential by providing access to diverse training and capacity building
- enabling controlled tourism development and conservation hunting activities
- covering an increasing portion of operational costs through conservancy generated income
- developing regional conservation structures

2016 saw:

- continued roll-out of Guidelines for the Management of Conservancies and Standard Operating Procedures by the MET
- continued development of adaptive management in conservancies using data collected by conservancies and collated in poster form

The biggest challenges?

- meeting the governance training needs of the large number of conservancies and community forests
- increasing the distribution of equitable financial benefits to members
- ensuring effective cooperation between conservancy committees and staff
- addressing the loss of institutional capacity and memory during conservancy committee changes
- managing competing expectations from stakeholders seeking access to returns from natural resources and other sources, especially farming

Managing Resources

... means ensuring that they are used wisely so that maximum returns are generated while the natural environment remains productive and healthy ...

Powerful management tools

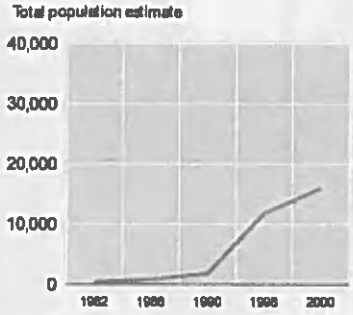
Traditional knowledge and skills are paired with modern technologies and approaches to enable effective management and innovative resource use.

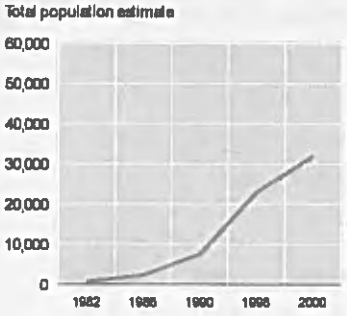
A wealth of information is gathered through a variety of monitoring mechanisms and processed to provide powerful management. As a result, rural communities are empowered to manage their natural resources to generate significant returns while at the same time ensuring the long-term health of the resource base – the natural environment. This encourages environmental restoration and biodiversity conservation.

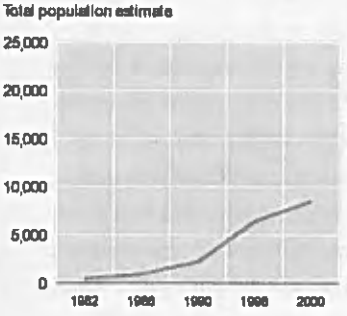
Wildlife populations

Remarkable wildlife recoveries have taken place due to conservancy efforts to minimize poaching and ensure the sustainable use of wildlife. This is most evident in the north-west, where wildlife had been reduced to small numbers through drought and poaching by the early 1980s. It is estimated that there were only 250 elephants and 65 black rhinos in the north-west at this time, and populations of other large mammals had been reduced by 60 to 90% since the early 1970s. Data from species experts shows that the number of rhinos and elephants has increased substantially since then. Aerial surveys (right) indicate that springbok, gemsbok and mountain zebra populations increased over 10 times between 1982 and the year 2000. Data from the annual North-West Game Count indicates fluctuations in the average number of animals seen. The fluctuation of game numbers in north-west Namibia is consistent with 'boom-and-bust' dynamics of arid environments. While strengthened community stewardship through communal conservancies has assisted with impressive population recoveries from the early 1980s through 2011, such good management cannot offset the impacts of four years of prolonged drought. However, the estimated numbers of all species remain at or above those recorded through the aerial surveys at the end of the period of the 1990s and far above the populations of the 1980s.

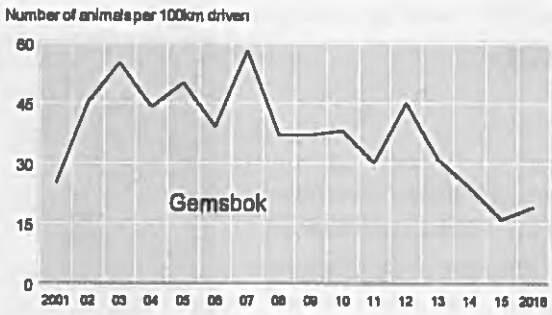
Aerial counts

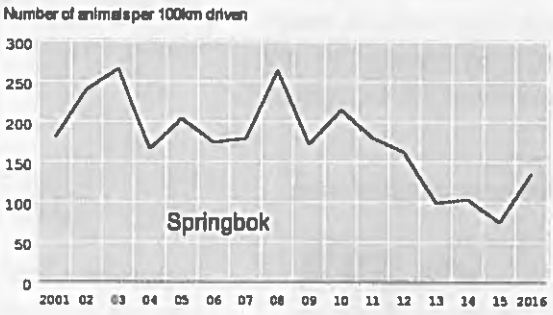






Annual North-West road-based Game Count





Natural resource management at a glance

At the end of 2016 there were...

- 83 conservancies using the Event Book monitoring tool (figures include 3 unregistered, emerging conservancies & the Kyaramacan Association)
- 51 conservancies conducting an annual game count
- 5 national parks undertaking collaborative monitoring with conservancies
- 72 conservancies holding quota setting feedback meetings
- 72 conservancies with own-use harvesting quotas
- 55 conservancies with conservation hunting concessions
- 18 conservancies with shoot & sell harvesting contracts
- 52 conservancies with a wildlife management plan
- 38 conservancies with a zonation plan
- 584 game guards and resource monitors working in conservancies

What's being achieved?

Community conservation means...

- combatting poaching, trafficking of wildlife products and other illegal activities
- mitigating human-wildlife conflict by limiting losses to farmers
- zoning areas for different land uses to reduce conflicts
- enabling wildlife recoveries, effective natural resource management and environmental restoration
- working to promote a large landscape approach to natural resource management
- black rhinos roam freely in communal conservancies
- elephants roam freely across 48 conservancies
- lions occur in 24 conservancies
- species that had become locally extinct in the Zambezi Region, such as eland, giraffe and blue wildebeest, are thriving after re-introductions

2016 saw:

- improvement of wildlife harvesting control mechanisms
- adaptive management strengthened with feedback from
- conservancies
- game guard accreditation scheme rolled out
- induction training for committees continued

The biggest challenges?

- low wildlife harvest quotas because game numbers have not fully recovered
- ensuring that wildlife harvesting is well-controlled and sustainable
- ill-informed criticism of natural resource management
- continued external threats to ban the export of hunting trophies
- building recognition of the vital role of community game guards
- minimizing impacts and optimizing returns from consumptive game use
- promoting incentive-based conservation
- increased commercial poaching and trafficking of wildlife products

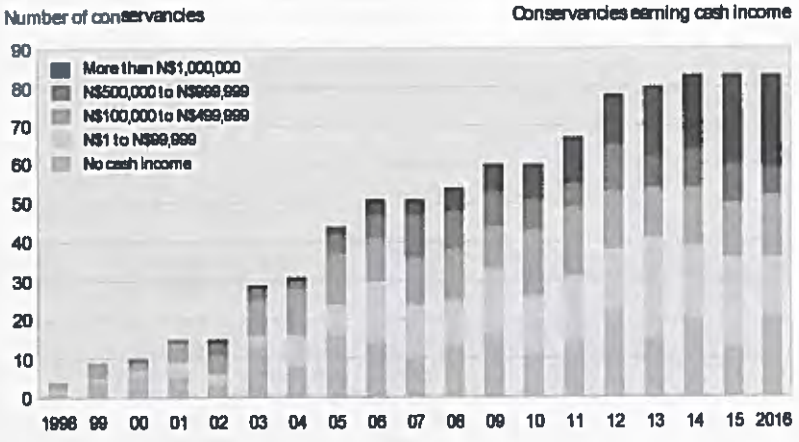
Improving Lives

... means empowering people to diversify incomes from farming to include economic opportunities based on tourism and wildlife ...

New income sources

Returns from wildlife and other natural resources generated through community conservation have proven to be substantial, including direct income to conservancies from tourism and conservation hunting, jobs created, and benefits including the distribution of game meat. New opportunities for rural job creation have arisen, especially in tourism where people are employed in a range of activities.

Diversification of income is a significant contribution to peoples' livelihoods and contributes to community resilience against episodic events such as drought and floods. The ability to cope with such events is increasingly necessary for rural communities confronted with the harsh reality of a climate changing to even greater levels of aridity.

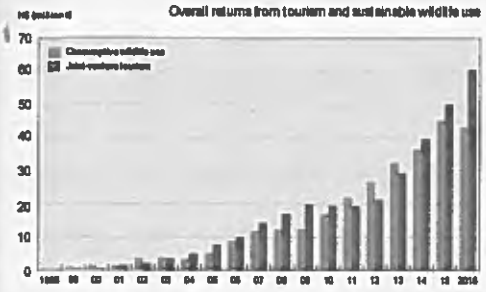


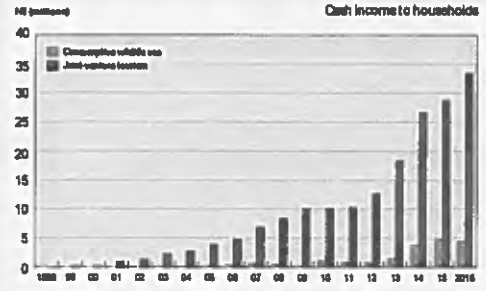
The earning power of conservancies
The graph shows the number of conservancies earning cash, divided into incremental categories (including the Kyaramacan Association). There are great differences in the potential of conservancies to generate cash income. It is noteworthy that the number of conservancies generating a high income, (dark blue, top) is increasing.

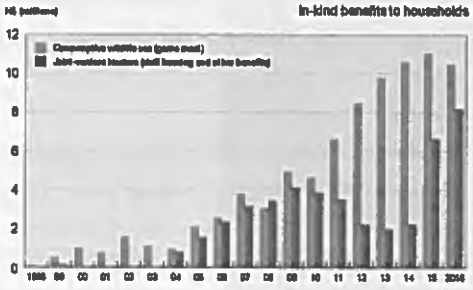
Anna Maria Kopper, IKhob INaub Conservancy

The earning power of conservancies

Significant differences exist between conservancies. There are vast differences in size (the biggest conservancies are more than 200 times as large as the smallest), as well as in the number of residents (ranging from several hundred to more than 30,000). Topography, rainfall and natural habitat influence the quantity and quality of natural resources available in a given area. The skills and experience of conservancy management also affect earning power. Joint-venture tourism and conservation hunting make the greatest financial contributions to conservation, e.g. game guard salaries, and to livelihoods. Meat from hunting is an important in-kind benefit to conservancy members







The complementary roles of sustainable consumptive wildlife use and joint-venture tourism

While overall returns from the two sectors are similar, consumptive wildlife enterprises, specifically conservation hunting, generates much higher fees to conservancies, which can be used to cover operational costs and development projects. In respect to in-kind benefits to households, conservation hunting remains the main contributor in the form of game meat.

Salambala Conservancy Treasurer Judy Mwinga

CBNRM returns at a glance

At the end of 2016 there were...

- 53 joint-venture tourism enterprises with 954 full time and 72 part time employees
- 38 conservancies directly involved in tourism activities
- 55 conservation hunting concessions with 136 full time and 179 part time employees
- 28 small/medium enterprises with 122 full time and 27 part time employees
- 853 conservancy employees
- 950 conservancy representatives receiving allowances
- 1,284 indigenous plant product harvesters
- 570 craft producers

In communal conservancies in Namibia

What's being achieved?

by community conservation...

- Conservancies and private sector partners generated N$ 111,232,053 in returns and benefits during 2016
- of this, tourism generated N$ 64,635,710; consumptive wildlife use (which includes hunting and live game sales) N$ 32,522,368; indigenous natural products N$ 1,620,136; and miscellaneous income (including items such as interest) N$ 1,984,880
- From consumptive wildlife use, meat to the value of N$ 10,468,960 was distributed to conservancy residents
- Conservancy residents earned a total cash income of N$ 52,492,271 from enterprise wages, of which N$ 32,173,686 was from joint venture tourism, N$ 14,744,081 from conservancies, N$ 3,596,691 from conservation hunting and N$ 1,977,813 from SMEs
- Conservancy residents earned cash income of N$1,400,638 from indigenous plants and N$1,465,841 from crafts
- N$ 11,252,045 was distributed to conservancy residents either in cash or used to support community projects

2016 saw:

- Piloting the Wildlife Credits and Incentives Scheme continued, designed to link the conservation performance of conservancies with investors willing to pay for independently verified conservation performance achievement. Revenue will be reinvested directly into human wildlife mitigation efforts and other conservation activities by conservancies

The biggest challenges?

- Improving the financial management of conservancies
- Increasing the ability of conservancies to manage their contractual responsibilities towards the private sector
- Involving the private sector, which benefits from conservancy conservation, e.g. mobile tourism operators
- removing barriers to private sector investment in communal areas, as there are considerable risk of investing in communal lands
- developing revenue streams in areas with low tourism potential or few natural resources

Working for a common vision...

... means focussing on what can be achieved, rather than yielding to difficulties; looking beyond individual activities and local impacts to regional, national and trans-boundary connections, influences and achievements, while facing challenges, anticipating change and striving for sustainability...

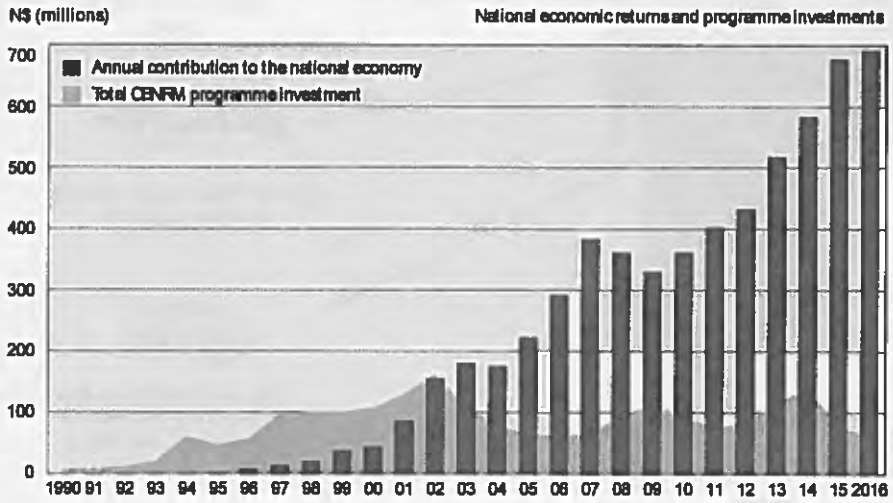
The Namibian conservancy movement has become an internationally acclaimed CBNRM success model. Community conservation is making significant biodiversity contributions and creating synergies with state protected areas. It is strengthening rural economies and contributing to rural development. A large number of conservancies are already fully self-financing. Other community conservation initiatives are well established and operating effectively. A sound foundation is being created, but more needs to be done to consolidate gains and attain sustainability. The CBNRM programme needs to integrate policies and activities fully, ensure adequate technical support and long term maintenance, continue to expand and diversify natural resource potential, and to remove barriers and counter threats that may arise.

How conservation contributes to the economy

Economic contributions from CBNRM may be termed contributions to net national income (NNI). The NNI contributions can be defined as the value of goods and services that community conservation activities make available each year to the nation.

Further economic values could be counted if adequate measures were available, including the economic value of local management institutions and the increased capacity that results from training provided to people associated with conservancies.

The economic merits of programme spending can be seen by comparing the investment in community conservation against returns in terms of NNI, and increasing annual stock asset values in a cost-benefit analysis (Figure right). This can provide an indication of the degree to which the investment made in the CBNRM programme has contributed overall to the national economy and whether this investment has been economically efficient



Estimates of the national economic returns from CBNRM compared to economic investment costs

In 2016, the net national income (NNI) contribution made by CBNRM was about N$ 692 million. Between 1990 and 2016, the cumulative value of the NNI contributions amounts to an estimated N$ 5.98 billion*.

The graph also shows the investment in the CBNRM programme each year, which cumulatively adds up to about N$ 2.1 billion of investment between 1990 and 2016. Donors supplied most of the funds, while the MET and NGOs also provided inputs, mainly as 'in-kind' contributions such as staff, vehicles and other kinds of support.

The future at a glance

Community conservation may ...

- grow to cover 90-100 conservancies and 40-50 community forests
- cover over 21% of Namibia and well over 50% of all communal land
- encompass up to 15% of all communal area residents and well over 50% of rural communal areas residents in suitable areas

What might be achieved?

Community conservation can...

- facilitate significant further growth of tourism in communal areas and increase local involvement
- enhance the reputation of Namibia as well as communal areas offering some of the country's most attractive destinations
- entrench Namibia's position, as offering some of the best conservation hunting on unfenced land in Africa
- mitigate the effects of climate change by reducing dependence on subsistence agriculture
- maximize the potential of indigenous plants through further strategic international partnerships
- strengthen incentives for people to live with and manage wildlife, and protect its habitat, so that future generations can continue to share in this important African heritage

2016 SAW:

- continued roll out of Game Guard Certification Scheme Wildlife Credits pilot programme expanded
- improved compliance with MET Standard Operating Procedures
- start of Wildlife Incentives and Credits Scheme
- progress towards the establishment of the Community Conservation Fund of Namibia

The biggest challenges?

- enabling optimum conservancy governance capacities, effective decision-making and wise leadership, as well as proactive membership
- countering the pressure to ban the legal consumptive use of wildlife
- optimizing land allocation and administration in communal areas
- ensuring long-term technical support to community conservation structures
- achieving self-sufficiency and programmatic sustainability
- creating country-wide awareness of the growing threat posed by commercial poaching and international wildlife crime

The Ministry of Environment and Tourism facilitates the registration of conservancies and is responsible for compliance monitoring. NACSO supports the MET in conservancy governance and assists in the annual game counts

NACSO MEMBERS

IRDNC

NDT

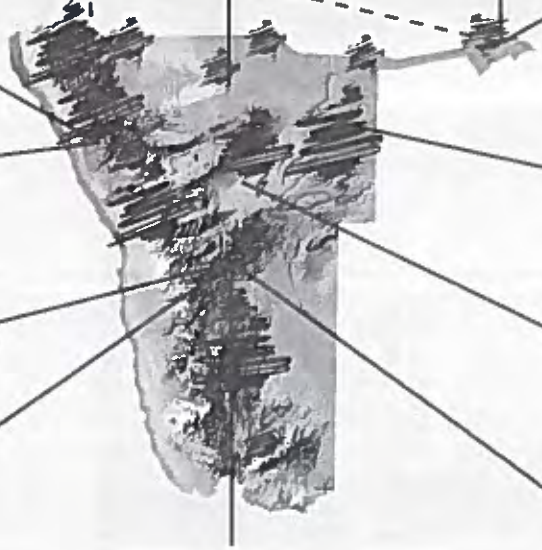
Provides technical support to conservancies including training in natural resources management; community capacity building; institutional and economic development; financial and logistical assistance

SAVE THE RHINO TRUST NAMIBIA

Implements rhino conservation and management, and responsible rhino tourism ventures

OMBA

Supports sustainable livelihoods through the development, sales and marketing of quality crafts



Associate member

TOSCO

Links the tourism industry to local people, conservation organizations and research.

NyaeNyae Development Foundation of Namibia

Supports San communities in conservancies

Researches into the social effectiveness of CBNRM and conservancies in Namibia

cheetah CONSERVATION FUND

Advises communal and commercial farmers on cheetah conservation

Associate member

Works to conserve Namibia's natural environment, to promote appropriate protection, wise use of natural resources and sustainable development

LEGAL ASSISTANCE CENTRE

Provides legal advice to conservancies on constitutions, contracts, legal conflicts, conflict resolution, and advocacy on CBNRM issues

Associate member

Provides technical support nationally to implementers in the fields of natural resource management, business and enterprise development, and institutional development

WWF

Associate members

Three Regional Conservancy Associations - Kavango, Kunene and Otjozondjupa.
These are independent organisations comprised of registered and emerging conservancies in their respective regions acting as representative umbrella bodies

Focus on fishery protection with the Namibia Nature Foundation

Namibia is well-known for its highly productive sea fisheries. But there is much less awareness of the vital role the inland river and floodplain fisheries in the north of Namibia play in food security and livelihoods for much of the country's rural population, including some of the poorest communities in the country.

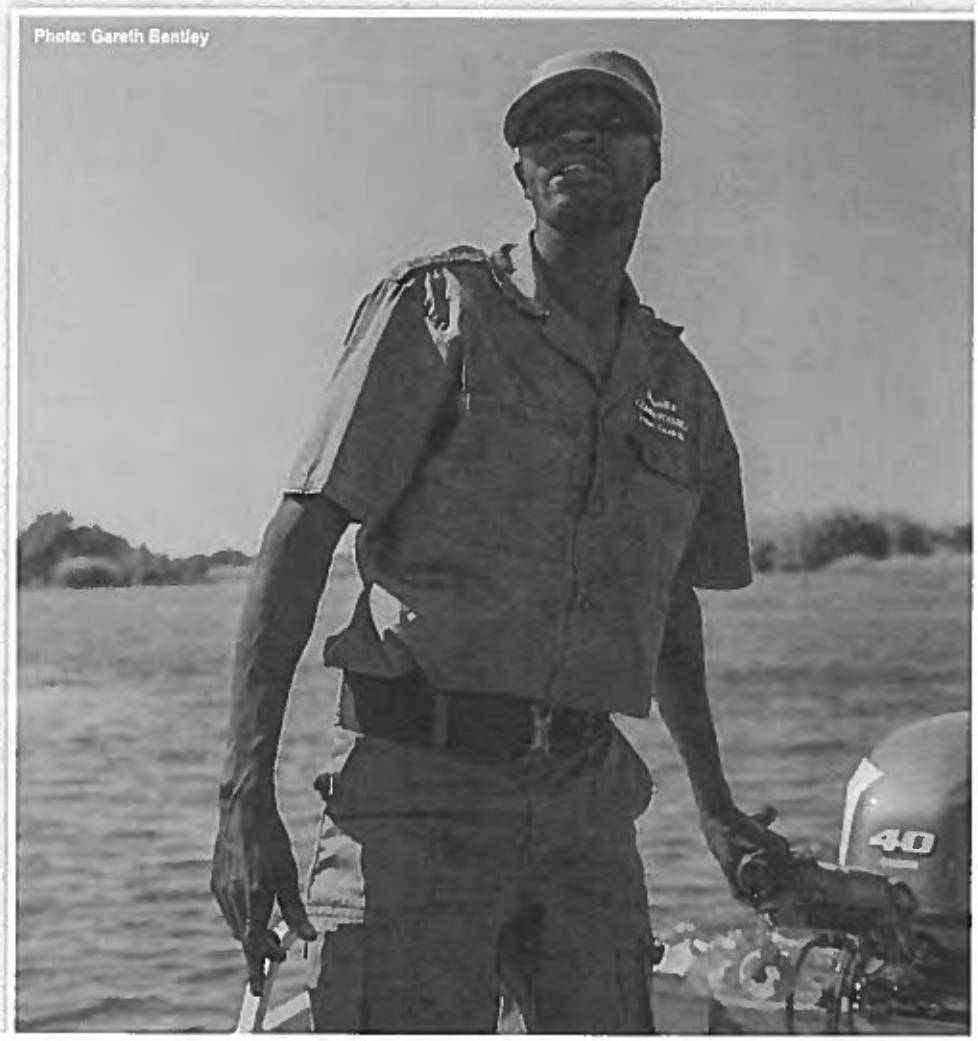
Three major perennial rivers in the north east of the country, the Kavango, Kwando and Zambezi, all support significant fisheries, with additional fishing in Oshanas, the shallow depressions that fill in the north central area during the flood season. However, these freshwater fisheries have in recent years suffered serious declines due to increased, uncontrolled exploitation using environmentally destructive fishing gear.

The NNF has a long-term programme, in partnership with ministries and other organizations, to address the situation. The current NNF EU-funded project, Community Conservation Fisheries in KAZA, aims to encourage and empower local communities to take responsibility for managing fishery resources sustainably.

Throughout the world, Marine Protected Areas (MPAs) are increasingly used to protect fish breeding stocks. This approach is increasingly understood by the Zambezi fishing communities, and the concept of Fish Protection Areas (FPAs) is being adopted by communities.

Two pilot FPAs have been established by Namibian communities, one in Sikunga Conservancy and another in Impalila Conservancy. In a major success last year, at the request of the conservancies and with the Minister of Fisheries and Marine Resources (Hon. Bernard Esau) having taken a direct interest, the FPAs were formally designated as "Fish Reserves" by the Namibia Government. Each of the protected river channels is over 12 km long and together they represent a major commitment to protecting the fish breeding stocks

This is an edited extract from an article by Denis Tweddle, Project Coordinator – NNF/EU Community Conservation Fisheries in KAZA Project



Fish guard on the Zambezi in Sikunga Conservancy

NACSO
Namibian Association of CBNRM Support Organisations

Community conservation

grew out of the recognition that wildlife and other natural resources were of value in communal areas, and that those resources could be unlocked if local communities were empowered to manage and utilize resources themselves.

The Namibian CBNRM programme is based on strong partnerships with the Namibian government, international donor agencies, local and international NGOs, the private sector and community conservation organizations.

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Brisendine, Amy <amy_brisendine@fws.gov>

Application no. 76466C (African lion trophy from Namibia)

1 message

Brisendine, Amy <amy_brisendine@fws.gov> Mon, Sep 9, 2019 at 3:34 PM
To: cf@conservationforce.org, jonathan@ulrichbarns.com
Cc: Amy Brisendine <amy_brisendine@fws.gov>

Hi,

Forwarding the below email; this is the 2nd request for this information; see below, thank you.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 45 calendar days of the date of this email, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

---------- Forwarded message ---------
From: **Brisendine, Amy** <amy_brisendine@fws.gov>
Date: Tue, Apr 2, 2019 at 9:16 AM
Subject: ESA import application no. 76466C (African lion trophy from Namibia)
To: <jjj@conservationforce.org>

Good morning John,

Forwarding fyi. Can you please email me the CITES permit from Namibia for this applicant?

Thank you and best regards.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org/

---------- Forwarded message ---------
From: **Brisendine, Amy** <amy_brisendine@fws.gov>
Date: Mon, Apr 1, 2019 at 10:18 AM
Subject: ESA import application no. 76466C (African lion trophy from Namibia)
To: <cf@conservationforce.org>
Cc: Amy Brisendine <amy_brisendine@fws.gov>

Hello,

I am reviewing the application of **Mr. Jonathan Ulrich** (received February 9, 2018 in our office) in which he is requesting to import an African lion trophy from Namibia.

Do you have a copy of his CITES export permit from Namibia yet? If so, could you please email a copy of it to me?

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 45 calendar days of the date of this email, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Thank you and please feel free to contact me if you have any questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA
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https://www.cites.org/

Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

19 Lossen Street
PO Box 98353
Windhoek
Namibia

Tel: +264 61 230888
Fax: +264 61 237036

officemanager@nacso.org.na

Share / Save

Balyerwa Conservancy

Derived from the Yeyi name for a now dry swamp that provided residents with a variety of natural resources

Quick facts

Registered:	October 2006
Region:	Zambezi
Area:	223 km^2
Approximate population:	1,307
Geographical features:	A mosaic of woodland and grassland. The average annual rainfall is 600 mm
Particular features:	Kwando River, Mamili National Park on southern border and

Mudumu National Park on northern border.

Major wildlife resources: Elephant, hippo, kudu, buffalo, leopard, bush pig, duiker, warthog, black-backed jackal, lion, spotted hyaena, crocodile, plains zebra, interesting bird life, tiger fish, catfish, various tilapia fish species.

Enterprises: Joint-venture tourism agreement with Lianshulu Lodge (in Mudumu National Park); trophy hunting; own-use hunting.

Management: Management Committee of eight men and one woman; wildlife monitoring using annual count on foot and Event Book monitoring system.

Contacts: PO Box 629, Ngweze; Tel: 081-3630908

Chairperson: Mr Clives Mulozi 0813234231
Manager: Rietz Sampofu 0812308545, priestssampofu@gmail.com
Secretary: Mr Calicious Bupilo 0813582087

More info

Game Count Data

Zambezi Game Count data 2018 (2018)

Zambezi Game Count data 2016 (2016)

Game Count Poster

Zambezi Game Count - East 2017 (2017 - One poster for Bwabwata, one for East Zambezi), Zambezi Game Count - Bwabwata 2017 (2017 - One poster for Bwabwata, one for East Zambezi)

Zambezi Game Count - East 2016 (2016 - One poster for Bwabwata, one for East Zambezi), Zambezi Game Count - Bwabwata 2016 (2016 - One poster for Bwabwata, one for East Zambezi)

Zambezi Game Count - Bwabwata 2015 (2015 - One poster for Bwabwata, one for East Zambezi),

Zambezi Game Count - East Zambezi 2015 (2015 - One poster for Bwabwata, one for East Zambezi)

Zambezi game count poster 2014 (2014)

Conservancy Profile Data

Conservancies Annual audit overview statistics 2017 (2017 - Overview statistics for 2017 giving information per conservancy on problem animals, poaching, predator sightings, introductions, performance scores, mortalities, rainfall, vegetation, fishing activity and catches etc as presented in the NR audit report posters.)

Conservancies Annual audit overview statistics 1999-2016 (2016 - Overview statistics for 1999 to 2016 giving information per conservancy on problem animals, poaching, predator sightings, introductions, performance scores, mortalities, rainfall, vegetation, fishing activity and catches etc as presented in the NR audit report posters.)

NR and Governance Posters

Balyerwa Annual audit 2017 (2017)

2016 Balyerwa Audit Report.pdf (2016)

2015 Balyerwa Audit Report.pdf (2015)

2014 Balyerwa Audit Report.pdf (2014)

Conservancy Profile Map

(2017)

Gazette

Gazette Balyerwa.pdf (2006)

» Generate formatted pdf for Balyerwa Conservancy to print and file

- Find a conservancy -

MET regional offices

Photo Library

Conservancy chairpersons' forum

LAC

NDT

NNF

NNDFN

OAT

SRT

CCF

MRCC-UNAM

» See all NACSO members

Tourism partners

Government Agencies

Location of...

Website by JARO Consultancy

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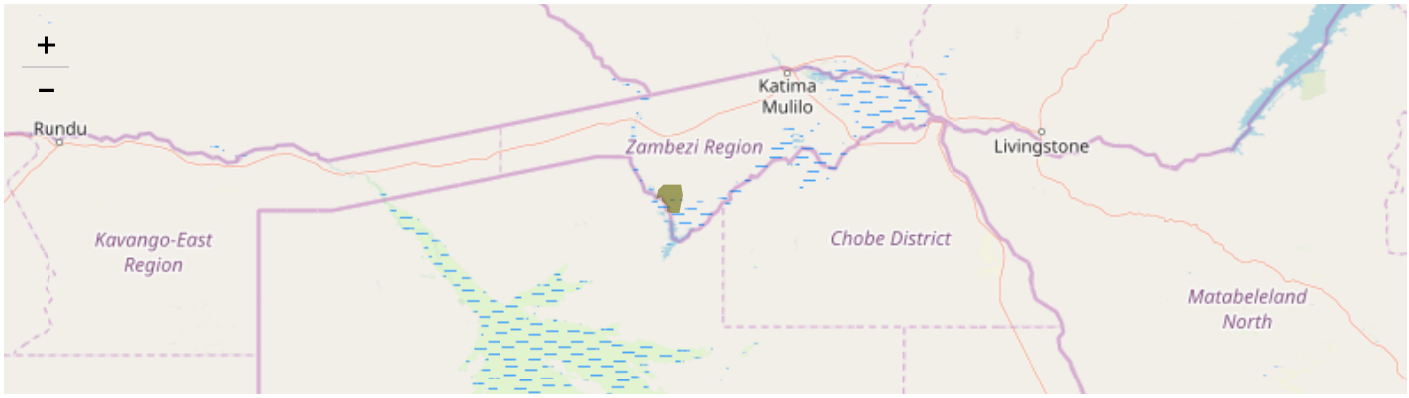
Wildlife Credits (/)

an incentive to conserve

Balyerwa Conservancy

Balyerwa conservancy was registered in 2006 and is small, covering 223 km^2 in Zambezi Region. The area is densely populated due to its fertile land and is a mosaic of woodland and grasslands bordered by the Kwando river, Mudumu National Park and Nkasa Rupara National Park. Conservancy income is derived from conservation hunting and plant utilisation. The income is distributed among members or invested in community projects.

Balyerwa Conservancy



Derived from the Yeyi name for an ancient swamp, now dry, that provided residents with a variety of natural resources, the conservancy was registered in 2006 and is small, covering 223 km2. There are 1,100 people in the area, situated in Zambezi Region in the north east of Namibia. The area is densely populated due to its fertile land. Balyerwa is a mosaic of woodland and grasslands, bordered by the Kwando river to the west, Mudumu National Park to the north and Nkasa Rupara National Park to the south. Wildlife includes elephant, hippo, kudu, buffalo, leopard, bush pig, duiker, warthog, black-backed jackal, lion, spotted hyaena, crocodile, plains zebra, interesting bird life and various fish species.

Conservancy income is derived from conservation hunting. The income is distributed among members or invested in community projects such as human-wildlife conflict awareness campaigns, schools and electrification.

Balyerwa, Wuparo and Dzoti Conservancies have recently jointly signed a Joint Venture agreement with a company called Natural Selection for a tourism concession in the Nkasa Rupara National Park.

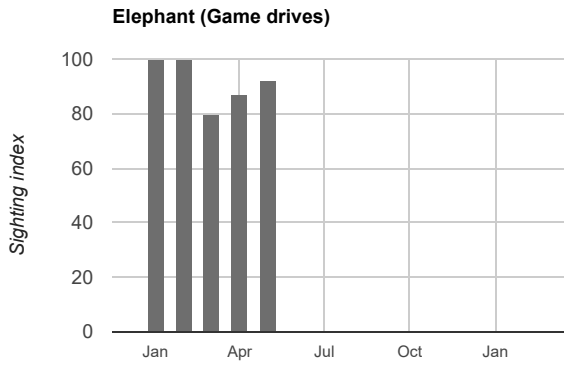
» Find out more about Namibia's game counts (/game-counts#east-zambezi) which include Balyerwa Conservancy.

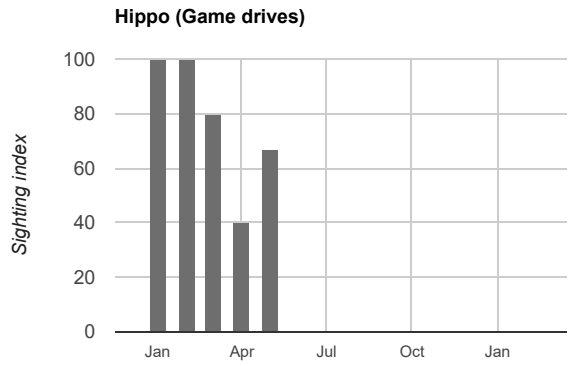
Balyerwa Conservancy has a Joint Venture enterprise with
Lianshulu Lodge (/lodge-info/lianshulu-lodge) (Not recording wildlife or making reward payments)

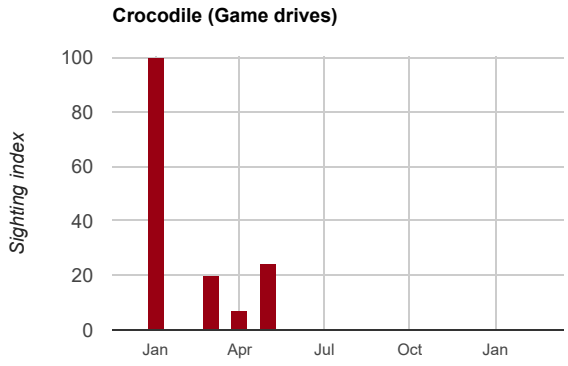
Wildlife sightings by participating lodges

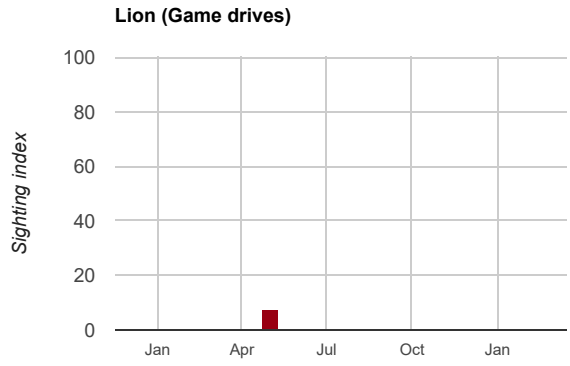
2012

Sightings were submitted for 5 months in 2012

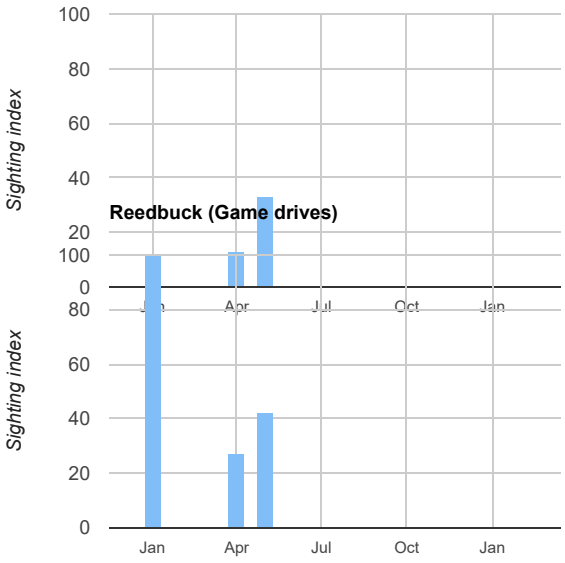




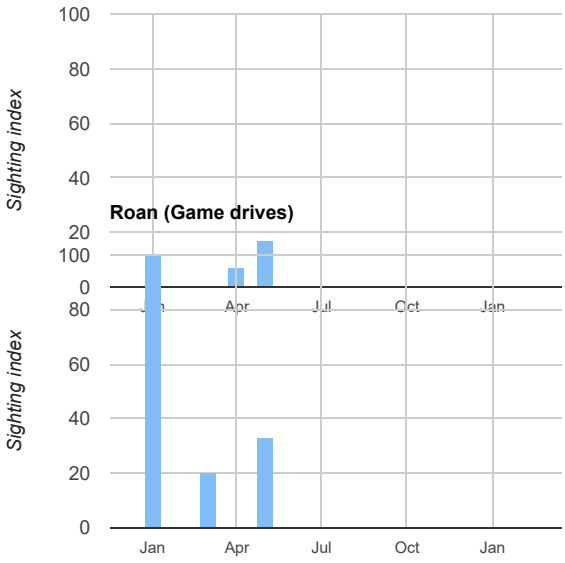




Buffalo (Game drives)



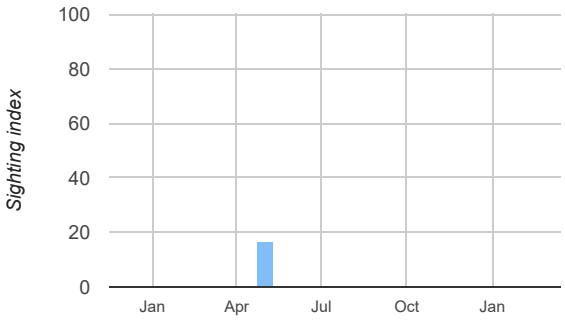
Lechwe (Game drives)



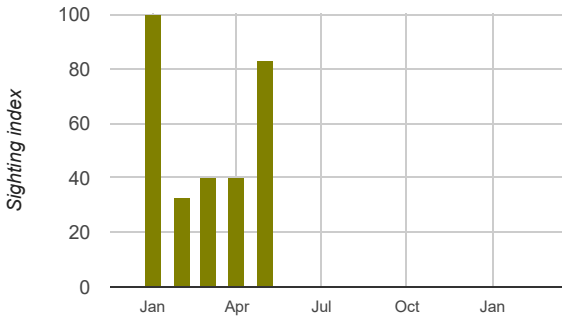
Reedbuck (Game drives)

Roan (Game drives)

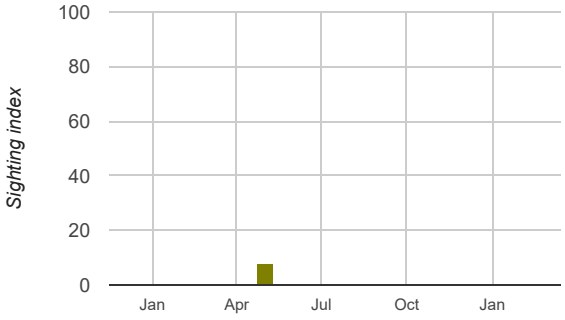
Waterbuck (Game drives)



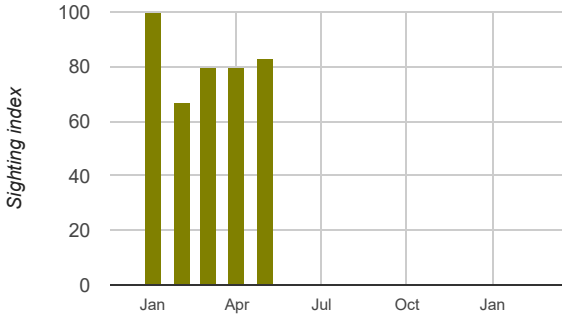
Baboon (Game drives)

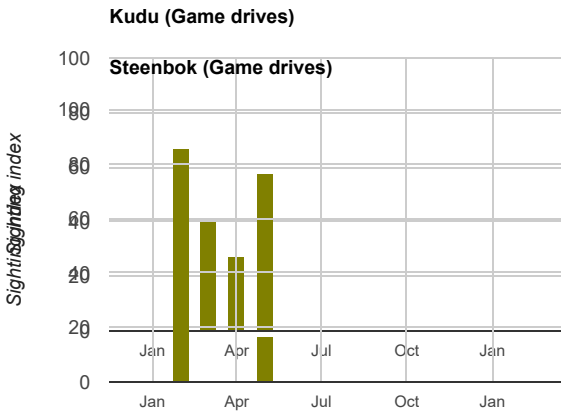


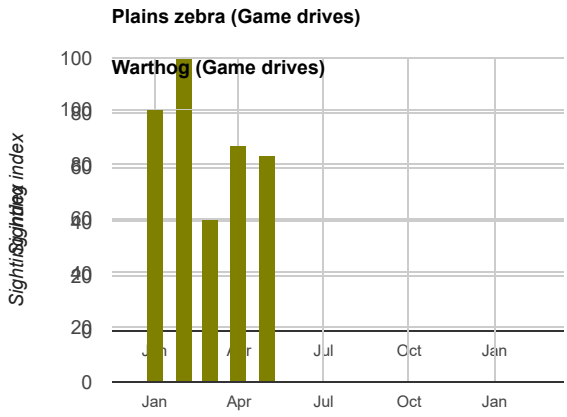
Giraffe (Game drives)

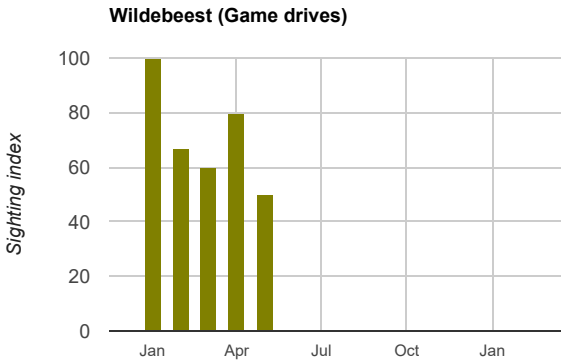


Impala (Game drives)





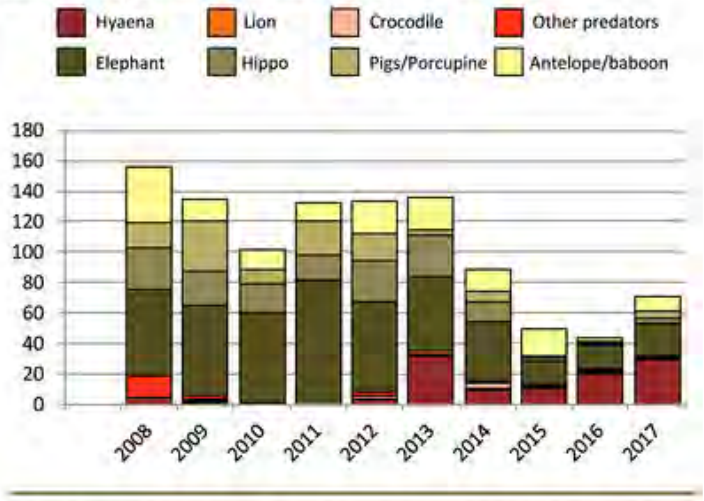




The sighting index represents the number of times a species was observed out of all the game drives and boat trips recorded. For example, if elephants were recorded on 4 out of 8 game drives in January the sighting index for that month would be 50%.

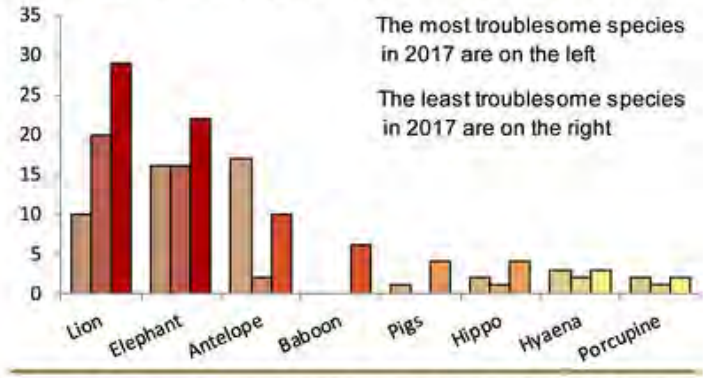
Human wildlife conflict trend

the chart shows the total number of incidents each year,
subdivided by species, grouped as herbivores and predators



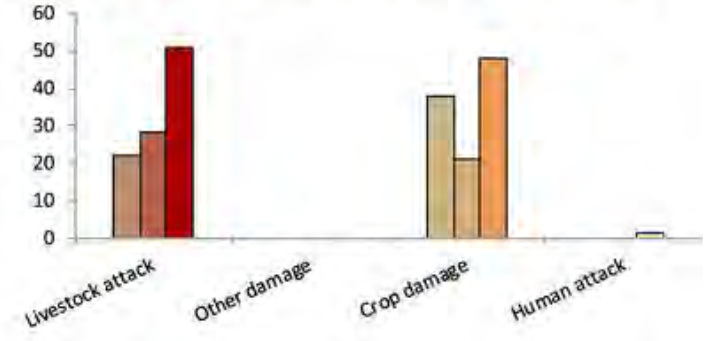
Most troublesome problem animals 2015-2017

the chart shows the number of incidents per species for the last 3 years;
the darkest bar (on the right) indicates the current year for each species



Type of damage by problem animals 2015-2017

the chart shows the number of incidents per category for the last 3 years;
the darkest bar (on the right) indicates the current year for each type



Wildlife Credits rewards communities that are protecting their wildlife

(http://www.nacso.org.na)

(http://www.nacso.org.na)

(/#facebook) (/#twitter) (/#pinterest) (/#google_plus) (/#whatsapp) (/#linkedin) (/#email) (/#google_gmail)

(https://www.addtoany.com/share#url=https%3A%2F%2Fwildlifecredits.com%2Fconservancy-info%2FBalyerwa&title=Balyerwa%20Conservancy)

GIVE TODAY

(http://www.today.com.na/give/wildlife-credits)

Support Wildlife Credits with a donation through GiveToday - easy and secure online payments from anywhere in the world.

Website by **Jaro Consultancy (http://www.jaroconsultancy.com)**

358	Bwabwata East	Lion	2007	4	3	147.9
632	Bwabwata West	Lion	2007	2	2	539.4
1219	Mahango	Lion	2007	19	9	321
1459	Mashi	Lion	2007	3	3	67.3
1769	Mudumu	Lion	2007	5	2	78.8
359	Bwabwata East	Lion	2008	3	2	609.2
633	Bwabwata West	Lion	2008	3	2	564.6
1220	Mahango	Lion	2008	8	5	322.7
1770	Mudumu	Lion	2008	6	4	292
360	Bwabwata East	Lion	2009	5	2	805
634	Bwabwata West	Lion	2009	1	1	548
1221	Mahango	Lion	2009	16	2	311
1771	Mudumu	Lion	2009	2	1	315
361	Bwabwata East	Lion	2010	45	25	824
635	Bwabwata West	Lion	2010	7	6	585
1222	Mahango	Lion	2010	7	5	318
362	Bwabwata East	Lion	2011	33	21	868
636	Bwabwata West	Lion	2011	8	4	516.7
1223	Mahango	Lion	2011	25	17	294.3
1772	Mudumu	Lion	2011	1	1	181.3
363	Bwabwata East	Lion	2012	26	17	832
637	Bwabwata West	Lion	2012	8	6	588.9
1224	Mahango	Lion	2012	3	2	336.7
364	Bwabwata East	Lion	2013	26	15	845.4
1225	Mahango	Lion	2013	6	5	327.2
365	Bwabwata East	Lion	2014	12	11	881
638	Bwabwata West	Lion	2014	2	1	565
1226	Mahango	Lion	2014	11	7	326
1773	Mudumu	Lion	2014	1	1	312
366	Bwabwata East	Lion	2015	12	6	867
639	Bwabwata West	Lion	2015	16	9	588
1227	Mahango	Lion	2015	8	5	329.7
171	Bamunu	Lion	2016	11	1	98
367	Bwabwata East	Lion	2016	10	4	811
832	Dzoti	Lion	2016	1	1	165
833	Dzoti	Lion	2016	1	1	110
1228	Mahango	Lion	2016	10	4	334
368	Bwabwata East	Lion	2017	21	13	860
640	Bwabwata West	Lion	2017	2	1	599
2162	Sioma-Ngwezi	Oribi	2017	1	1	439
369	Bwabwata East	Ostrich	2007	9	3	147.9

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3	
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2.26	**Average**
0.2	

NOTICE OF REPRESENTATION

FEB 9 2018

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

Name: Timothy J. Dayka

Date: 1/24/18

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DAYKA	TIMOTHY	J	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
CLOVIS	CA	93619	FRESNO	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
SAME

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA33600C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

1/26/2018

Signature (photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe, Deka Pool Safari Area, Matabeleland North, DD -18,472852, 26,425552 Hwange

   b. Date wildlife is to be hunted:

      10 JUNE 2019 TO 01 JULY 2019

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      SKIN, SKULL, TEETH, CLAWS (ALL PARTS FOR LIFE SIZE MOUNT)

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	TROPHY CONSULTANTS INTERNATIONAL
Business Name:	TROPHY CONSULTANTS INTERNATIONAL
Address:	4 JOSIAH CHINAMANO RD
Address:	BELMONT
City:	BULAWAYO
State/Province:	MATABELELAND
Country, Postal Code:	ZIMBABWE 0000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised that raw ivory, once imported into the United States, cannot be re-expor

(b) (6)

Applicant's signatu Date: 11/24/18

Be aware that ther ts by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

TAJIKISTAN ARGALI-THREATENED SPECIES IMPORT

Permit Number: MA33600C-0

Effective: 08/02/2017 Expires: 08/01/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TIMOTHY J. DAYKA
(b) (6) [redacted]
CLOVIS, CA 93619
U.S.A.

Authority. Statutes and Regulations: 16 USC 1533(d); 50 CFR 17.32.

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Conditions and Authorizations:

A. Authorized to import, for personal non-commercial use, the sport-hunted trophy of one male Marco polo argali (*Ovis ammon polii*) taken during the 2017 / 2018 (September 1, 2017 to March 1, 2018) hunting season from the Murgab region of the Republic of Tajikistan.

B. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tajikistan for the 2017 / 2018 season.

C. Trophy must be accompanied by a valid Convention of International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Tajikistan.

D. If no trophy is imported, this permit should be returned to the Division of Management Authority on or before the expiration date.

E. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

F. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

G. Valid for use by permittee named above.

H. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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August 16, 2019

RCVD AUG 23 2019

Attn: Anna Barry, Biologist
U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: PRT No. 76468C – Supplement to Lion Trophy Import from Zimbabwe for Tim Dayka

Dear Ms. Barry:

This document and the attached materials are supplement to our existing lion trophy import application for Tim Dayka, PRT No. 76468C. We have the following information to add to the application:

The lion in question was harvested on June 21, 2019. The lion was taken from Deka Safari Area and the GIS Coordinates (see attached map) are as follows:

S 18 degrees 31 minutes 5.5 seconds
E 26 degrees 29 minutes 3.199 seconds

Current location of Trophy:
Attn: Graham Hingestone / HHK Safaris
4 Wayhill Lane West
Umwinsidale, Harare
Zimbabwe

Attached Copy of Zimbabwe Hunting Permit, Hunting Return Form (TRAS2), photo of the lion harvested and a Personal Statement from Tim Dayka about his hunt. Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl: Map
Email dated 8/16 with GIS Coordinates
Personal Statement – Tim Dayka
Copies of hunting permits – Zimbabwe
Photo of Lion harvested

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Timothy J. Dayka
Zimbabwe Hunt June 11-29, 2019

Outfitter: HHK Safaris/Hunters and Guides

Exact Location/Concession: Deka Pools (approximately 80-100 miles east of Victoria Falls). Deka Pools is part of the Deka Safari area

Concession Details: Deka Pools is a designated hunting area of the Zimbabwe National Parks system. The area is approximately 80,000 hectares/200,000 acres and is leased in 5 year increments to safari operators; HHK/Hunter and Guides holds the current lease and is who I hunted with. The concession borders Hwange National Park and human habitation is not permitted. It is completely natural/wild. A team of approximately 30 National Park Rangers (headquartered in Matetsi) maintains and protects a total of approximately 500,000 hectares/1,250,000 acres of which the Deka Safari Area is included. **Important Note:** Deka Pools is designated by the National Parks system as **IPZ (intensive protection zone).** Park Rangers patrol and camp for extended periods of time in Deka Pools in order to monitor potential poaching issues and protect wild life. The area contains a wide range of plains game and all of the Big 5 (black rhino, elephant, lion, leopard and cape buffalo).

Funding: I was told the National Parks system is self-sustaining. Lease proceeds for Deka Pools goes directly to National Parks to pay for Ranger salaries and other overhead. In addition, annual income from hunting trophy fees goes directly to the National Parks system. The Zimbabwe National Parks system is a combination of non-hunting (photographic and tourist areas) and hunting areas. It is obvious that more money is needed, but the income from both hunting and non-hunting activities is essential for on-going wild life protection. The economic situation in Zimbabwe makes poaching a real threat for game meat and rhino/elephant (illegal horn and ivory trade) as well as other big game species.

Park Rangers and how Deka Pools is managed: During my hunt, a National Park Ranger was assigned to the hunting party and was 100% present for all hunting activity. This is standard for all hunts/hunters. In addition, small teams of 2-3 Rangers camped and patrolled remote parts of Deka Pools as part of their anti-poaching activities; I personally met/witnessed these patrols. HHK/Hunters and Guides provided the Rangers with transportation to and from the camp areas. At one point in the hunt, we discovered an extensive wire snare line near a major water source (photo of removed snare included). The Park Ranger assigned to our hunting party as well as all of us in the hunting party (5 of us total) spent more than an hour removing the snares and searching

for additional snare activity. Upon return to the main hunting camp, the park ranger contacted headquarters and the HHK/Hunters and Guides staff went to Matetsi headquarters, picked up a team of rangers and a comprehensive sweep of the area was conducted to try to locate and arrest the snare line poachers; unfortunately, they were not found.

The Game: During the hunt, we saw the following species: lion, leopard, elephant, cape buffalo, zebra, giraffe, warthog, impala, waterbuck, kudu, blue wildebeest klipspringer, duiker, grysbok, bushbuck, baboon, monkey, and an extensive array of birds. Fresh eland and wild dog tracks were present. but we did not physically see them.

Game successfully harvested included: Lion, Leopard, Cape buffalo, klipspringer, impala, warthog, zebra, and giraffe.,

Lion: During the hunt, I quizzed PH Derek Adams about the lion population in Deka Pools. Derek was a Park Ranger from 1979-1988 and has been a full time PH from 1989 to the present; he obviously has extraordinary experience. Derek believes there are 6 prides that frequent Deka Pools with the following estimated total populations:

1. Bomboosi Lion Pride: Approximately 8-9 members
2. Gobo Springs Lion Pride: Approximately 6 members
3. Sinamatella Lion Pride: Approximately 23 members
4. Tchabika Lion Pride: Approximately 6 members
5. Gulangwenya Lion Pride: Approximately 4 members
6. Deka Tail Lion Pride: Approximately 3-4 members

There is one male lion tag on quota for this area and that tag represents an estimated 2% of the total lion population. A male lion must be a minimum of 6 years old; Derek estimates the lion harvested on this hunt at 8 ½- 9 years old. The national parks office will verify the actual age at a later date.

Arrival 10/06/19 1030

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05).
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081869
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	HHK SAFARIS P/L	**Client's Full Name**	TIMOTHY JAN DAYKA
ZTA (HOP) No.	HOP0017	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	4 WAYHILL LANE UMWINSDALE P O BOX CH273 CHISIPITE HARARE hhk@mweb.co.zw	**Address**	(b) (6) CLOVIS, CA 93619. USA
Name of Professional Hunter	DEREK ADAMS	**Licence No.**	004
Telephone		**Fax**	NA
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist		Address	
Name of Shipping Agent		Address	
Name of Foreign Agent	Safaris Unlimited LLC	Address	125C North Broad St Suite 313 Thomasville Georgia 31792 USA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Deka Pool	Matabeleland North	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	11-06-2019
Date of Safari To	01-07-2019
Daily Rate Charged For Big Game USD	2,250.00
Daily Rate Charged For Plains Game USD	00
Daily Rate Charged for Non hunting guests USD	00
Number of Accompanying Guests	0

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
ZPWMA
Date Stamp 19 JUN 2019
P. BAG 5926
VICTORIA FALLS

DH 00118

SPECIES Form 16

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PCA:
PCA 196
Amount paid $250
Date 13-03-19
Rec No. H10IR079806

(payment details)

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act (*Chapter 20:14*),

to Armus Trading

of Deka Pool

and co-hunter

of

Freely to hunt on Hunt Number or Section Deka Pool of the Mat North

Area such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-19

and 31-12-19

Animal	A	B	Animal	A	B	Animal	A	B
Baboon	10		Giraffe (m)	1		Pigeons/ Doves	150	
Buffalo (m)	9		Grysbok (m)	1		Porcupine	2	
Bushbuck (m)	2		Guinea fowl	150		S. Hyena	10	
Civet	4		Impala (f)	20		Sable (m)	1	
Duiker (m)	3		Impala (m)	45		Sandgrouse	50	
Eland (m)	1		Jackal	3		Serval	2	
Elephant(m)	4		Klipspringer (m)	5		Warthog (m)	9	
Elephant(t/l)	2		Kudu (m)	10		Waterbuck (m)	2	
Francolin	150		Leopard (m)	3		Wildcat	2	
Genet	2		Lion (m)	1		Zebra	8	

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

for and on behalf of the Director General, *Parks and Wild Life Management Authority*

(Designation)

for Hunt e Manager

for and on behalf of the Director General, *Parks and Wild Life Management Authority*

(Designation)

Date stamp of authority which issue the permit

Tim Dayka

PRT No. 76468C

Lion Harvested on June 21, 2019

Tim Dayka <timd@daykahackett.com> 8/16/2019 10:39 AM

Dayka Lion Hunt.....Deka Pools Zimbabwe

To permits@conservationforce.org <permits@conservationforce.org> Copy John Jackson (jjjiii@att.net) <jjjiii@att.net>

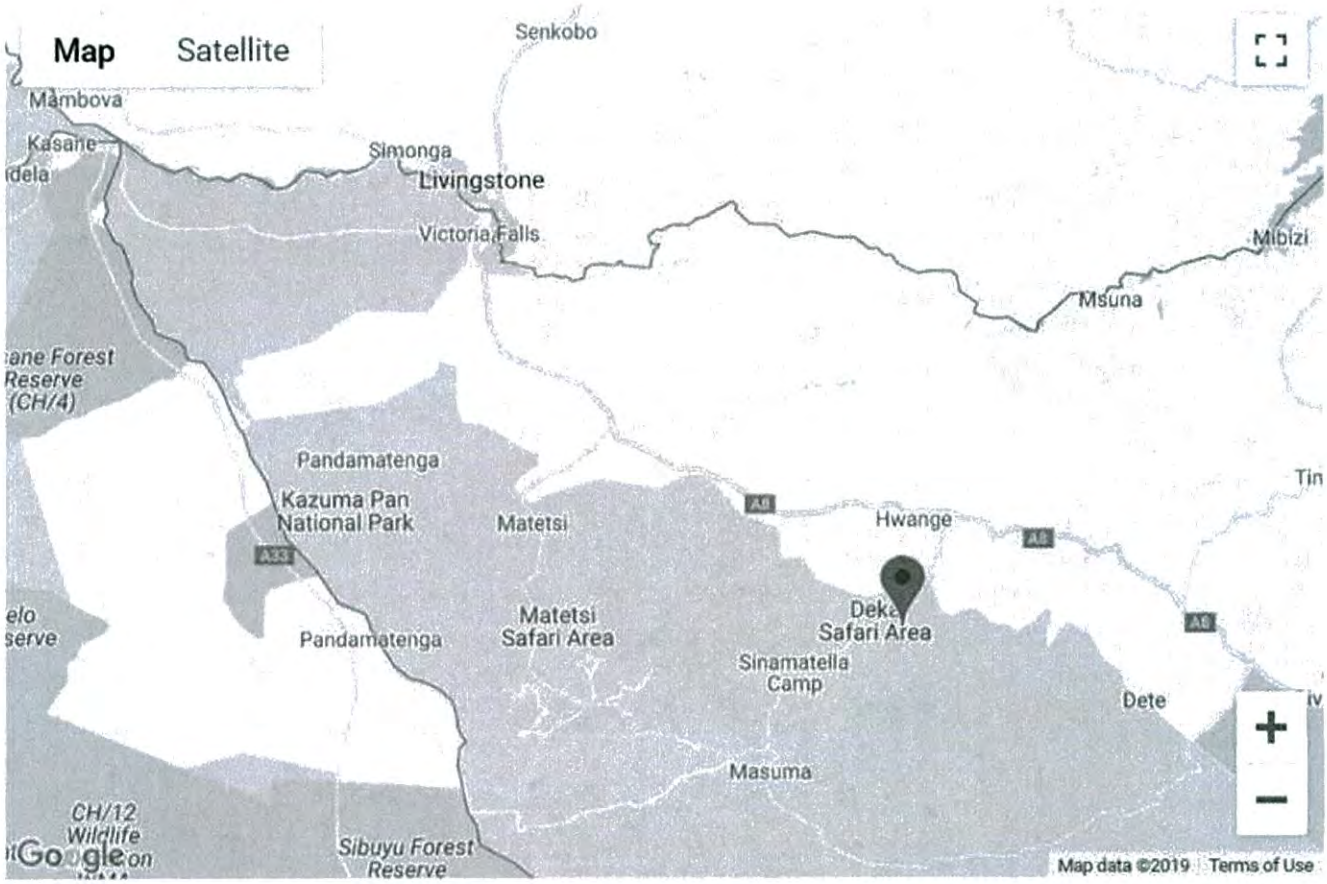
Rachel:

Coordinates below the map....and map for Dayka Lion Hunt. Lion harvested June 21, 2019.

Thanks.

Tim

From: Tina Harvey
Sent: 08/16/19 8:26 AM
To: Tim Dayka
Subject: Deka Pools Zimbabwe

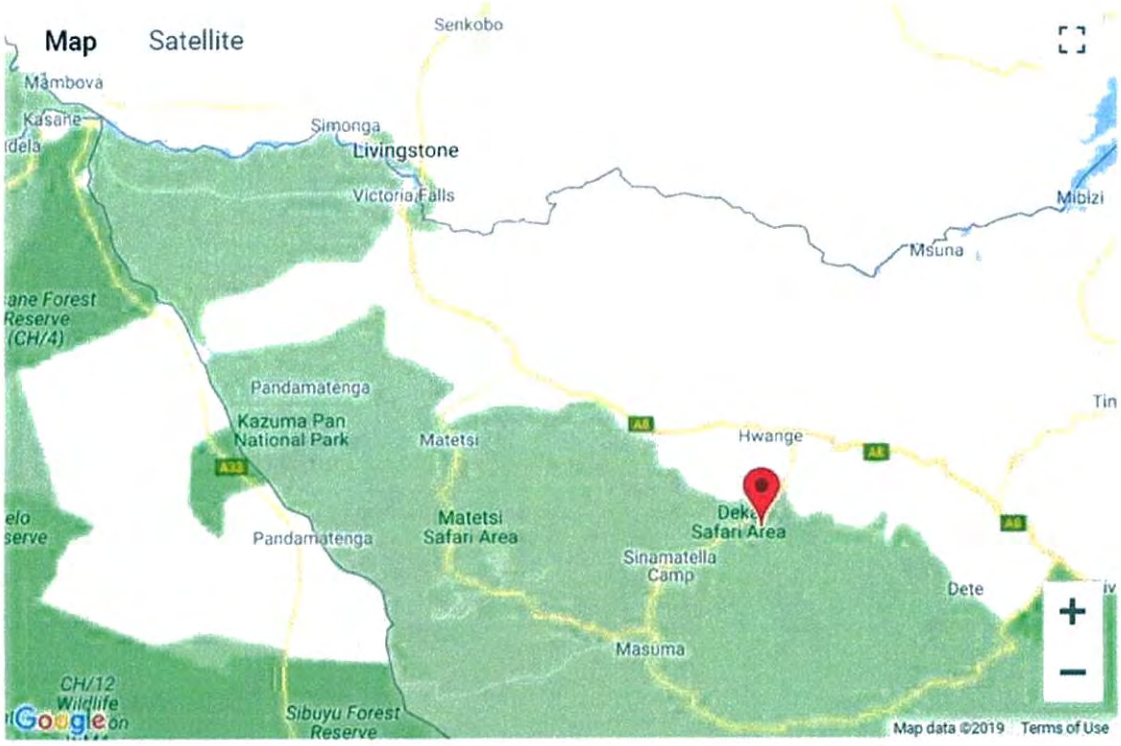


DMS (degrees, minutes, seconds)*

Latitude	○ N ◉ S	18	°	31	'	5.5	"
Longitude	◉ E ○ W	26	°	29	'	3.199	"

Tina Harvey
Dayka & Hackett, LLC
p: 559-643-8008 ext.2230
w:www.daykahackett.com

- image001.jpg (41 KB)
- image002.jpg (10 KB)
- image003.png (96 KB)


Map
Satellite
Senkobo
Mambova
Kasane
Simonga
Livingstone
Victoria Falls
Mbizi
Msuna
ane Forest
Reserve
(CH/4)
Pandamatenga
Kazuma Pan
National Park
Matetsi
Hwange
A8
A33
Matetsi
Safari Area
Pandamatenga
Sinamatella
Camp
Dete
Masuma
CH/12
Wildlife
Sibuyu Forest
Reserve
Google
Map data ©2019
Terms of Use

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import application / request for information

1 message

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:16 PM
To: hdelamarter@prestigecare.com

Mr. Delamarter,

We are in the process of reviewing applications for the import of African lions taken from Tanzania.

The U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. We are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings that were developed in the past. As such, we would like to give you the opportunity to submit additional information in support of your application. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

RCVD APR 30 2018

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Delamarter	Harold	Guy	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room # no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Brush Prairie	WA	98606	Clark	USA

2.a. Mailing address (Include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ...nt herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Sig(b) (6) ...ures) Date of signature (mm/dd/yyyy)

04/23/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Harold Delamarter, (b) (6)
(b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

XXX No Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo Melanochaita (sub species) Lion

b. Sex (if known).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Tanzania, Selous Game Reserve

b. Date wildlife was hunted: October, 2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Luke Samaras Safaris LTD, PO Box 3483, Dar Es Salaam, Tanzania

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Erasmia, Pretoria, South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Paula Fernandes
Business Name: Oxi Logistics (PTY) Ltd
Address: Farm 354, Hennospriver
City: 0023 Pretoria Gauteng, South Africa
State/Province:
Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

No

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

N/A

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

No

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in eco[redacted]nport a leopard trophy, I understand that I may only import two leopa[redacted]

    Applicant's signature: [redacted] Date: 04/23/2018

    Be aware that there may be addi[redacted]by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Portland OR
(b) (6)
Portland OR 97238
(b) (6)

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Permit Application #88032C

1 message

Harcum, Heather <heather_harcum@fws.gov> Tue, Sep 10, 2019 at 3:26 PM
To: hdelamarter@prestigecare.com, ddubuque@prestigecare.com

Good afternoon Harold,

I am reaching out in regards to your application to import an African lion trophy (*Panthera leo melanochaita*) with Luke Samaras Safaris Ltd. from the Selous Game Reserve in Tanzania. This application was received on April 30, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. As such could you please respond to the following:

1. Confirm your physical address (currently we have 24411 NE 128th St. Brush Prairie, WA 98606).

2. An operator report from Luke Samaras Safaris Ltd. which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Information about the safari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anit-poaching activities and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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Harcum, Heather <heather_harcum@fws.gov>

Operator Enhancement Report for Trophy Import (USFWS PRT #88032C)

1 message

Harcum, Heather <heather_harcum@fws.gov> Thu, Sep 26, 2019 at 4:02 PM
To: info@samarassafaris.com

Good afternoon,

My name is Heather Harcum and I am a representative of the United States Fish and Wildlife Service (USFWS), reviewing an import permit application for a lion trophy hunted in Tanzania through Luke Samaras Safaris Ltd.

We would like receive the most updated information about the operators our potential importers hunted with. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. Could you please provide us with an operator report which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
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If an operator report is not available, we have attached a questionnaire that could also be particularly helpful.

Warmly,

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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Op Enhancement Qs.docx
68K

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Permit Application #88032C

3 messages

Harcum, Heather <heather_harcum@fws.gov> Tue, Sep 10, 2019 at 3:26 PM
To: hdelamarter@prestigecare.com, ddubuque@prestigecare.com

Good afternoon Harold,

I am reaching out in regards to your application to import an African lion trophy (*Panthera leo melanochaita*) with Luke Samaras Safaris Ltd. from the Selous Game Reserve in Tanzania. This application was received on April 30, 2018.

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Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
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Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Debbie Dubuque <Debbie.Dubuque@prestigecare.com> Thu, Sep 26, 2019 at 2:46 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>, Harold Delamarter <Harold.Delamarter@prestigecare.com>
Cc: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>

Yes, confirming the physical address for Harold Delamarter is 24411 NE 128th St, Brush Prairie WA 98606

Heather, can you please give us an updated timeline of when we might expect this application to be approved?

Thank you for your consideration, Debbie Dubuque

Debbie Dubuque

Exec Assist to Partners/CEO
Prestige Care Inc
Central Support Office

7700 NE Parkway Dr, Ste 300

Vancouver WA 98662-6654
Office: 360-816-8295
Cell: 503-705-9044
Fax: 360-314-1792
Debbie.Dubuque@prestigecare.com
www.prestigecare.com

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Please consider the environment before printing this email

[Quoted text hidden]

Harcum, Heather <heather_harcum@fws.gov> Thu, Sep 26, 2019 at 3:48 PM
To: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>

Thank you Debbie,

This will depend on when we are able to get information on the operator. If you have an operator report, we would love to have you provide it. Otherwise, I will reach out to try and obtain this. Once we have that information we can review for enhancement of the species. It's a little difficult to put an exact timeline on it, but this may take a couple of months with our reviewer. We have obtained most of the information necessary from Tanzania itself, so the process is moving forward.

Thank you,
Heather Harcum
[Quoted text hidden]

Harcum, Heather <heather_harcum@fws.gov>

Application for an Import of a Sport-Hunted Lion Trophy

1 message

Harcum, Heather <heather_harcum@fws.gov> Mon, Dec 23, 2019 at 11:12 AM
To: luke@samarassafaris.com

Good morning,

My name is Heather Harcum and I am a representative of the United States Fish and Wildlife Service (USFWS), reviewing an import permit application for a lion trophy hunted in 2016 in Tanzania through Luke Samaras Safaris Ltd.

We would like to receive the most updated information about the operators our potential importers hunted with. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. Could you please provide us with an operator report which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
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If an operator report is not available, we have attached a questionnaire that could also be particularly helpful.

Warmly,
Heather Harcum
--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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Operator Enhancement Questionnaire.docx
28K

Re: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Harcum, Heather L <heather_harcum@fws.gov>

Tue 3/3/2020 7:10 AM

To: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>

Good morning Debbie,

I wanted to reach out to see if you could provide any addional` information for Mr. Harold Delamarter regarding my previous e-mail on the import of his sport hunted lion trophy. In particular we are still looking for an operator report from Luke Samaras Safaris Ltd. which includes, but is not limited to-

- Population status or trend data on the lion populaon` (countrywide and local to the game reserve/hunting block)
- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Informaon about the saàfari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anti-poaching activities and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submi ed to TAWA would be particularly helpful.

We may additionally reach out to the outfitter himself for this information, if you give us the permissions to do so.

If we do not receive the informa on requested above within 45 days from the date of this e-mail, your incomplete applica on will be placed in our inac ve files and we will not complete your request for a permit.

Very respectfully,
Heather Harcum

From: Debbie Dubuque <Debbie.Dubuque@pres. gecare.com>
Sent: Thursday, September 26, 2019 2:46 PM
To: Harcum, Heather L <heather_harcum@fws.gov>; Harold Delamarter <Harold.Delamarter@prestigecare.com>
Cc: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: RE: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Yes, confirming the physical address for Harold Delamarter is 24411 NE 128th St, Brush Prairie WA 98606

Heather, can you please give us an updated timeline of when we might expect this application to be approved?

Thank you for your consideration, Debbie Dubuque

Debbie Dubuque

Exec Assist to Partners/CEO
Prestige Care Inc
Central Support Office
7700 NE Parkway Dr, Ste 300
Vancouver WA 98662-6654
Office: 360-816-8295
Cell: 503-705-9044
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Please consider the environment before printing this email

From: Harcum, Heather <heather_harcum@fws.gov>
Sent: Tuesday, September 10, 2019 12:26 PM
To: Harold Delamarter <Harold.Delamarter@prestigecare.com>; Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Good afternoon Harold,

I am reaching out in regards to your application to import an African lion trophy (*Panthera leo melanochaita*) with Luke Samaras Safaris Ltd. from the Selous Game Reserve in Tanzania. This application was received on April 30, 2018.

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Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,

Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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[EXTERNAL] USFWS ESA Lion Trophy Permit Application #88032C

Debbie Dubuque <Debbie.Dubuque@prestigecare.com>

Mon 3/16/2020 3:43 PM

To: Harcum, Heather L <heather_harcum@fws.gov>
Cc: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>; Harold Delamarter <Harold.Delamarter@prestigecare.com>

Hi Heather,
In answer to your ques. on regarding your contacting the outfitter for the necessary information you need to allow the Lion Trophy to be imported, that would be a huge help. Mr. Harold Delamarter gives his permission for you to contact them. I am trying to reach out to Luke Samaras Safaris LTD as well.

Thank you so much for your email letting us know that you are still in need of the "Operator Report". Please let us know if any additional issues arise that need immediate attention. Debbie Dubuque

Debbie Dubuque
Exec Assist to Partners/CEO
Prestige Care Inc
Central Support Office
7700 NE Parkway Dr, Ste 300
Vancouver WA 98662-6654
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Please consider the environment before printing this email

From: Harcum, Heather L <heather_harcum@fws.gov>
Sent: Tuesday, March 03, 2020 4:11 AM
To: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: Re: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Good morning Debbie,

I wanted to reach out to see if you could provide any addional in formaon f or Mr. Harold Delamarter regarding my previous e-mail on the import of his sport hunted lion trophy. In parcular w e are sll looking for an operator report from Luke Samaras Safaris Ltd. which includes, but is not limited to-

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We may addionally r each out to the oui er himself for this informaon, if y ou give us the permissions to do so.

If we do not receive the informa on requested above within 45 days from the date of this e-mail, your incomplete applica on will be placed in our inac ve files and we will not complete your request for a permit.

Very respecully ,
Heather Harcum

From: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Sent: Thursday, September 26, 2019 2:46 PM
To: Harcum, Heather L <heather_harcum@fws.gov>; Harold Delamarter <Harold.Delamarter@prestigecare.com>
Cc: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: RE: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Yes, confirming the physical address for Harold Delamarter is 24411 NE 128th St, Brush Prairie WA 98606

Heather, can you please give us an updated timeline of when we might expect this application to be approved?

Thank you for your consideration, Debbie Dubuque

Debbie Dubuque
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Sent: Tuesday, September 10, 2019 12:26 PM
To: Harold Delamarter <Harold.Delamarter@prestigecare.com>; Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
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Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Lion Trophy Import Application #88032C

Harcum, Heather L <heather_harcum@fws.gov>

Mon 3/16/2020 3:53 PM

To: luke@samarassafaris.com <luke@samarassafaris.com>

Good a. ernoon Mr. Samaras,

I wanted to reach out to see if you could provide any addional in formaon f or Mr. Harold Delamarter regarding my previous e-mail on the import of his sport hunted lion trophy. In parcular w e are sll looking for an operator report from your operaon, which ma y include, but is not limited to:

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If we do not receive the informa on requested above within 45 days from the date of this e-mail, your incomplete applica on will be placed in our inac ve files and we will not complete your request for a permit.

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Phone 703-358-2350 | Fax 703-358-2115

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[EXTERNAL] RE: Lion Trophy Import Application #88032C

Luke Samaras Safaris Ltd <info@samarassafaris.com>

Thu 3/26/2020 10:18 AM

To: Harcum, Heather L <heather_harcum@fws.gov>

1 attachments (3 MB)

Block Development Luke Samaras Safaris ltd.pdf;

Dear Ms. Harcum,

We have been opera. ng our four concessions in the Selous Game reserve since 1986 and can assure you we have a very stable Lion population in our concessions of MS1, U4, LR1 and LR2. I am a aching the reports that was required by the Tanzania Wildlfe Management Authority with regard to our Community Development, Anti-Poaching activities and Block development as requested in your email. At present, the percentage of the Game Fees retained for conservation and community by the game reserve is set at 50%.

With regard to the Lion population in Tanzania and in particular to the Selous I would like to refer you to the report that was carried out available on the internet under lion population report in Tanzania.

I hope that the above assists you in deciding with regard to the application of our client.

Yours sincerely,

Luke Samaras

From: Harcum, Heather L [mailto:heather_harcum@fws.gov]
Sent: 16 March 2020 22:53
To: luke@samarassafaris.com
Subject: Lion Trophy Import Application #88032C

Good afternoon Mr. Samaras,

I wanted to reach out to see if you could provide any addional in formaon f or Mr. Harold Delamarter regarding my previous e-mail on the import of his sport hunted lion trophy. In parcular w e are sll looking for an operator report from your operaon, which ma y include, but is not limited to:

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Very respecully ,
Heather Harcum

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USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

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LUKE SAMARAS SAFARIS LTD
P.O. Box 3483
DAR ES SALAAM
TANZANIA
Office: 255 222 860102
Private: 255 222 600458
Fax: 255 222 600711
Mobile: 255 784 324942
E-Mail: info@samarassafaris.com

Adventures into the Wild
Big Game Hunting and Photographic Safaris

Dr. James V Wakibara,
Conservation Commissioner,
Tanzania Wildlife Management Authority,
Office of the Conservation Commissioner,
Kingolwira Area,
Dar-es-Salaam Road,
Tafori Building,
P.O. Box 2658,
Morogoro.

20th December, 2019

Your ref: CDF.517/541/01
Our ref: LSSL/TAWA/2/12/19

Dear Sir,

Re: Request for Information

In accordance with your letter of 15th December, 2019, herewith please find enclosed the required Data Sheet and Summary Reports of our Community Development, Block Development and Anti-Poaching Activities for the years 2016-2019.

We should like to bring to your attention that our four Blocks are situated in the Selous Game Reserve and there are no communities either within or adjacent to them. Therefore, part of the Community contribution of US$5,000.00 per block has been utilized towards anti-poaching and block development.

Should there be any further information that you require, please let us know.

Yours faithfully,

Luke J. Samaras
Managing Director

PLEASE NOTE: OUR 4 SEZOUS G/R BLOCKS DO NOT HAVE COMUNTIES WITHIN THE BLOCKS OR ADJSUNT! AT OUR KINGUPIRA GAME STATION WE HAVE A SMALL COMUNITY CALLED NGARAMBE VILLIGE WHICH WE DONATE MEDICAL SUPLIES AND DONATE FUNDS TO A VIRITETY OF PROJECTS. WE CYCLE THE COMUNITY $5000 INTO ANTI-POACHING AND BLOCK DEVELOPMENT WITHIN OUR BLOCKS PLEASE LOOK AT REPORTS ATTACHED.

LUKE SAMARAS SAFARIS LTD.

TANZANIA WILDLIFE MANAGEMENT AUTHORITY

FORMAT OF DATA REQUIRED FROM HUNTING OPERATORS

S/N	HUNTING BLOCK	HUNTING COMPANY	YEAR	COMMUNITY CONTRIBUTION (5,000 USD)	CONTRIBUTION TO ANTI POACHING (USD)	CONTRIBUTION INFRASTRUCTURE (USD)	OTHER COMMUNITY CONTRIBUTION (USD)
1	MS1	LUKESAMARAS	2016	$5000	$7,850	$17,550	
2	U4	LUKESAMARIS	2016	$5000	"	"	
3	LR1	LUKESAMARIS	2016	$5000	"	"	
4	LR2	LUKESAMARIS	2016	$5000	"	"	
1	MS1	LUKESAMARIS	2017	$5000	$7,808	$15,888	
2	U4	LUKSSAMARIS	2017	$5000	"	"	
3	LR1	LUKESAMARIS	2017	$5000	"	"	
4	LR2	LUKESAMARIS	2017	$5000	"	"	
1	MS1	LUKESAMARIS	2018	$5000	$5,600	$21,834	
2	U4	LUKESAMARIS	2018	$5000	$ "	"	
3	LR1	LUKESAMARIS	2018	$5000	"	"	
4	LR2	LUKESAMARIS	2018	$5000	"	"	
1	MS1	LUKESAMARIS	2019	$5000	$5,530	$26,834	
2	U4	LUKESAMARIS	2019	$5000	"	"	
3	LR1	LUKESAMARIS	2019	$5000	"	"	
4	LR2	LUKESAMARIS	2019	$5000	"	"	

Contributions for the year 2016.

Block development.

There were 952 kilometers or road cleared over a period of 72 days. This has helped to be able tp access all parts of our four blocks in the Selous, namely LR1, LR2, MS1 and U4, with regard to hunting with our clients ,but also for better anti-poaching. It is also a medium of information that is passed on to the Game warden at Kingupira on the situation in the different parts of the four blocks with regard to poaching activities. The clearing crew consisted of 7 people, a game scout and the driver.

The total cost of this, with regard to salaries, foodstuff and oils and fuel consumed amounted to t.Shs. 15,273,400/- equivalent to US $ 7,450.00.
Vehicle use for this clearing amounts to $ 7200.00 of which 40% should be credited to anti-poaching $ 2880.00.

Two airstrips were also cleared, Kibesa and Namkonko. It required a total of 8 days per airstrip and a crew of 10 persons. The foodstuff, salaries fuel and consumable amount to T.Shs. 2,600,000/- equivalent to US$ 1300.00. Vehicle use for the 16 days was $ 1600.00.

Total cost of the above road and airstrip clearing US$ 17,550.00

Anti-poaching.

We carried out a total of two separate operations totaling 30 days in coordination of the Kingupira Game scouts. Two separate groups of game scouts were involved on each 15 day operation, they were led by our in charge of anti-poaching, Mr. Joseph Kilindo, and we supported the group with our employees of cook and helper.
Cost of all this activity with regard to salaries foodstuff oils and fuel used amounted to T Shs. 3,211,400/- equivalent to $ 1570.00. + the credit as described above $ 2880.00. Cost of vehicle use amounted to $3400.00.

Total cost of the anti-poaching activities US$ 7850.00

Total amount for both the above activities US $ 25,400.00

Community development.

A donation of 5,000,000/- towards repair of the Mtendajis office kata ya Ngarambe.
A donation of 900,000/- was also given to Kingupira sector for clearing 42kms of boundary Road.

Contributions for the year 2017.

Block development.

There were 820 kilometers or road cleared over a period of 72 days. This has helped to be able to access all parts of our four blocks in the Selous, namely LR1, LR2, MS1 and U4, with regard to hunting with our clients . It is also a medium of information that is passed on to the Game warden at Kingupira on the situation in the different parts of the four blocks with regard to poaching activities. The clearing crew consisted of 7 people, a game scout and the driver.

The total cost of this, with regard to salaries, foodstuff and oils and fuel consumed amounted to t.Shs. 13,500,000/- equivalent to US $ 6,054.00
Vehicle use for this clearing amounts to $ 7000.00 of which 40% should be credited to anti-poaching $ 2800.00.

Two airstrips were also cleared, Kibesa and Namkonko. It required a total of 8 days per airstrip and a crew of 10 persons. The foodstuff, salaries fuel and consumable amount to T.Shs. 2,750,000/- equivalent to US$ 1234.00. Vehicle use for the 16 days was $ 1600.00.

Total cost of the above road and airstrip clearing US$ 15,888.00

Anti-poaching.

We carried out our normal two separate operations totaling 30 days in coordination of the Kingupira Game scouts. Two separate groups of game scouts were involved on each 15 day operation, they consisted of 5 scouts led by our in charge of anti-poaching, Mr. Joseph Kilindo, and we supported the group with cook and helper.
Cost of all this activity with regard to salaries foodstuff oils and fuel used amounted to T Shs. 3,600,000/- equivalent to $ 1,608.00. + the credit as described above $ 2800.00. Cost of vehicle use amounted to $3400.00.

Total cost of the anti-poaching activities US$ 7,808.00

Total amount for both the above activities US $ 23,696.00

Community development.

A donation to Ngarambe ofisi ya kata of T. Shs. 3,000,000/= we contributed on 12/09/2017.

Contributions for the year 2018.

Block development.

There were 820 kilometers or road cleared over a period of 96 days. This year 620 km of our hunting track were graded in our LR1, LR2, MS1 and U4, blocks . The gradeing team consisted of our road clearing crew, 7 clearers driver and game scout, grader operator and assistant, one G12 grader provided by SGR office. We donated funds, and man power to get the grader road worthy.

The total cost of this, with regard to salaries, foodstuff and oils and fuel consumed and grader repars amounted to t.Shs. 27,360,000/- equivalent to US $ 12,000.00
Vehicle use for this clearing amounts to $ 7000.00 of which 40% should be credited to anti-poaching $ 2800.00.

Two airstrips were also cleared, Kibesa and Namkonko. It required a total of 8 days per airstrip and a crew of 10 persons. The foodstuff, salaries fuel and consumable amount to T.Shs. 2,750,000/- equivalent to US$ 1234.00. Vehicle use for the 16 days was $ 1600.00.

Total cost of the above road and airstrip clearing US$ 21,834.00

Anti-poaching.

We carried out our normal two separate operations totaling 30 days in coordination of the Kingupira Game scouts. Two separate groups of game scouts were involved on each 15 day operation, they consisted of 5 scouts led by our in charge of anti-poaching, Mr. Joseph Kilindo, and we supported the group with cook and helper.
Cost of all this activity with regard to salaries foodstuff oils and fuel used amounted to T Shs. 3,600,000/- equivalent to $ 1,608.00. + the credit as described above $ 2800.00. Cost of vehicle use amounted to $3400.00.

Total cost of the anti-poaching activities US$ 5,600.00

Total amount for both the above activities US $ 27,431.00

500,000/- Donated to Utete via Kingupira office.
4,000,000/- To ngarambe for office building project.

Contributions for the year 2019.

Block development.

There were 920 kilometers or road cleared over a period of 96 days. This year 820 km of our hunting track were graded in our LR1, LR2, MS1 and U4, blocks This took 66 days of work.
The grading team consisted of our road clearing crew, 7 clearers driver and game scout, grader operator and assistant, one G12 grader provided by SGR office. We donated funds, and man power to get the grader serviced, repaired and road worthy.

The total cost of this, with regard to salaries, foodstuff and oils and fuel consumed and grader repairs amounted to t.Shs. 38,760,000/- equivalent to US $ 17,000.00
Vehicle use for this clearing amounts to $ 7000.00 of which 40% should be credited to anti-poaching $ 2800.00. The Northeastern boundary of the reserve starting from Niakusiku to lake Mtanza was also graded which should assist the anti-poaching units access that sector.

Our Two airstrips were also cleared and graded, Kibesa and Namkonko. It required a total of 5 days per airstrip and a crew of 10 persons. The foodstuff, salaries fuel and consumable amount to T.Shs. 2,750,000/- equivalent to US$ 1234.00. Vehicle use for the 16 days was $ 1600.00.

Total cost of the above road and airstrip clearing US$ 26,834.00

Anti-poaching.

During the period of June to November we covered the cost of 8 Games scouts in night allowance, and food. Each game scout spent an average of 15 days in the field with our camp building crew and road clearing crews, gathering information and also protecting our hunting areas.
This reflects to 120 days at a cost of t.sh 3,480,000($1,526)
Fuel Est. 1,320 liters Tsh 2,745,600($1,204)

Total cost of anti-poaching activities $5,530.00

Community Development

We donated Tsh 3,420,000($1,500) Worth of medical supplies to Kingupira Dispensary, for free use for the Ngarambe village community.

Total cost of Block development, anti-poaching, community development $ 33,864.00

Re: [EXTERNAL] USFWS ESA Lion Trophy Permit Application #88032C

Harcum, Heather L <heather_harcum@fws.gov>

Mon 3/30/2020 10:46 AM

To: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>

Good morning Debbie,

I have received the operator report from Mr. Samaras, however I still require the hunting license issued to Mr. Delamarter in Tanzania.

Additionally, the application states that the specimen is currently in South Africa. Could you please provide the CITES export permit from Tanzania showing the legal export from Tanzania to South Africa?

Thank you,
Heather Harcum

From: Debbie Dubuque <Debbie.Dubuque@pres. gecare.com>
Sent: Monday, March 16, 2020 4:07 PM
To: Harcum, Heather L <heather_harcum@fws.gov>
Subject: RE: [EXTERNAL] USFWS ESA Lion Trophy Permit Application #88032C

Thank you so much. Hopefully, this is resolved quickly.

Have a great day, Debbie

Debbie Dubuque
Exec Assist to Partners/CEO
Prestige Care Inc
Central Support Office
7700 NE Parkway Dr, Ste 300
Vancouver WA 98662-6654
Office: 360-816-8295
Cell: 503-705-9044
Fax: 360-314-1792
Debbie.Dubuque@prestigecare.com
www.prestigecare.com

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Please consider the environment before printing this email

From: Harcum, Heather L <heather_harcum@fws.gov>
Sent: Monday, March 16, 2020 12:56 PM
To: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: Re: [EXTERNAL] USFWS ESA Lion Trophy Permit Application #88032C

Thank you for your response, Debbie. We are also reaching out to Luke Samaras for this informaon and hope we can receive something in order to more thoroughly review the operaon in which Mr . Delamarter hunted so we can connue r eview for issuance.

Best regards,
Heather Harcum

From: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Sent: Monday, March 16, 2020 3:43 PM
To: Harcum, Heather L <heather_harcum@fws.gov>
Cc: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>; Harold Delamarter <Harold.Delamarter@prestigecare.com>
Subject: [EXTERNAL] USFWS ESA Lion Trophy Permit Application #88032C

Hi Heather,
In answer to your question regarding your contacting the outfitter for the necessary information you need to allow the Lion Trophy to be imported, that would be a huge help. Mr. Harold Delamarter gives his permission for you to contact them. I am trying to reach out to Luke Samaras Safaris LTD as well.

Thank you so much for your email letting us know that you are still in need of the "Operator Report". Please let us know if any additional issues arise that need immediate attention. Debbie Dubuque

Debbie Dubuque
Exec Assist to Partners/CEO
Prestige Care Inc
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7700 NE Parkway Dr, Ste 300
Vancouver WA 98662-6654
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Please consider the environment before printing this email

From: Harcum, Heather L <heather_harcum@fws.gov>
Sent: Tuesday, March 03, 2020 4:11 AM

To: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: Re: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Good morning Debbie,

I wanted to reach out to see if you could provide any addional in formaon f or Mr. Harold Delamarter regarding my previous e-mail on the import of his sport hunted lion trophy. In parcular w e are sll looking for an operator report from Luke Samaras Safaris Ltd. which includes, but is not limited to-

- Populaon s tatus or trend data on the lion populaon (c ountrywide and local to the game reserve/hunng block)
- Informaon on the f ees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Informaon about the sa fari oui er, professional hunter, concession holder/land owner, and their acvies t o conserve the species (e.g., habitat management/improvement, an-poaching acvies and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populaons, lion populaon monit oring, and community benefits). Copies of recent reports submi ed to TAWA would be parcularly help ful.

We may addionally r each out to the oui er himself for this informaon, if y ou give us the permissions to do so.

If we do not receive the informa on requested above within 45 days from the date of this e-mail, your incomplete applica on will be placed in our inac ve files and we will not complete your request for a permit.

Very respecully ,
Heather Harcum

From: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Sent: Thursday, September 26, 2019 2:46 PM
To: Harcum, Heather L <heather_harcum@fws.gov>; Harold Delamarter <Harold.Delamarter@prestigecare.com>
Cc: Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: RE: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Yes, confirming the physical address for Harold Delamarter is 24411 NE 128th St, Brush Prairie WA 98606

Heather, can you please give us an updated timeline of when we might expect this application to be approved?

Thank you for your consideration, Debbie Dubuque

Debbie Dubuque
Exec Assist to Partners/CEO
Prestige Care Inc
Central Support Office
7700 NE Parkway Dr, Ste 300
Vancouver WA 98662-6654
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Debbie.Dubuque@prestigecare.com
www.prestigecare.com

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Please consider the environment before printing this email

From: Harcum, Heather <heather_harcum@fws.gov>
Sent: Tuesday, September 10, 2019 12:26 PM
To: Harold Delamarter <Harold.Delamarter@prestigecare.com>; Debbie Dubuque <Debbie.Dubuque@prestigecare.com>
Subject: [EXTERNAL]USFWS ESA Lion Trophy Permit Application #88032C

Good afternoon Harold,

I am reaching out in regards to your application to import an African lion trophy (*Panthera leo melanochaita*) with Luke Samaras Safaris Ltd. from the Selous Game Reserve in Tanzania. This application was received on April 30, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. As such could you please respond to the following:

1. Confirm your physical address (currently we have 24411 NE 128th St. Brush Prairie, WA 98606).

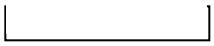
2. An operator report from Luke Samaras Safaris Ltd. which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Information about the safari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anit-poaching activities and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115



www.CITES.org

ORIGINAL

12223

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

September 21, 2015 2:13:10 pm

MAIN PERMIT

IN.# **3006454**

APP: **2002960**

GAME HUNTING PERMIT

RETURN DATE: Wednesday, November 11, 2015

PERMIT NO. **2002961**

Station DAR ES SALAAM **Start Date** October 01, 2015 **End Date** October 21, 2015 **Package Type** 21 DAYS **Extra Days:** 0

This RESIDENT'S / VISITOR'S Permit is Granted to HAROLD DELAMARTER **of Address** **Passport No.** 517914371

Who holds Weapon (Type) RIFLE **Calibre** 375, 300 **Maker's Number** N31334, 7118 **C.A.R Number** -

Licence Number 231 **Dated** 11-Sep-2015 **Issued At** **Weapon owner & Address** HAROLD DELAMARTER

and entitles him to hunt the below animals in the (Game area and blocks) SELOUS GR MS1

owned by LUKE SAMARAS SAFARIS LTD

PH ARTHUR PATRICK CURTIS,

Additional Blocks SELOUS GR LR1,SELOUS GR LR2,SELOUS GR U4,

Signature of Holder

Signature of Issuing Officer & Official Stamp

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	AFRICAN ELEPHANT	1	
2	BABOON YELLOW	1	
3	BUFFALO AFRICAN CAPE	3	
4	BUSHBUCK CHOBE	1	
5	BUSHPIG	1	
6	CIVET AFRICAN	1	
7	CROCODILE NILE	1	
8	DUIKER COMMON	1	
9	ELAND LIVINGSTONES	1	
10	GENET BLOTCHED	1	
11	GRYSBOCK SHARPE'S	1	
12	HARTEBEEST LICHTEINSTEIN'S	2	
13	HIPPO	1	
14	HYAENA SPOTTED	1	
15	IMPALA SOUTHERN	2	
16	KUDU GREATER	1	
17	LEOPARD	1	
18	LION	1	
19	ORIBI COMMON	1	
20	REEDBUCK BOHOR	1	
21	SABLE ANTELOPE ROOSEVELT	1	
22	SUNI (PYGMY ANTELOPE)	1	
23	WARTHOG	1	
24	WATERBUCK COMMON	1	
25	WILDEBEEST NYASA	2	
26	ZEBRA BURCHELL'S	2	

1. This permit must be surrendered to a Licensing Officer of the Wildlife Division within 21 days of its expiry or immediately the Professional hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on the business of a Trophy dealer.
3. The maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. The Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer or sell.

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOURISM

WILDLIFE DIVISION

September 21, 2015 2:13:11 pm

12223

PERMIT NO. 2002961

COMPANY LUKE SAMARAS SAFARIS LTD

GAME AREA SELOUS GR MS1

ADD. BLOCKS SELOUS GR LR1,SELOUS GR LR2,SELOUS GR U4,

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GAME RANGER DETAILS FULL NAME	DATE	SIGNATURE
ZEBRA	26	MS1	300	1-10-15	1400	M	SHABANI I CHANDE	1-10-15	
HYENA	14	MS1	300	2-10-15	1800	M	SHABANI I CHANDE	2-10-15	
HARTEBEEST	12	MS1	375	5-10-15	1400	M	SHABANI I CHANDE	5-10-15	
HARTEBEEST	12	LR2	300	6-10-15	1130	M	SHABANI I CHANDE	6-10-15	
HIPPO	13	MS1	375	8-10-15	0800	M	SHABANI I CHANDE	8-10-15	
WATERBUCK	24	MS1	375	8-10-15	1700	M	SHABANI I CHANDE	8-10-15	
BUFFALO	3	MS1	375	12-10-15	0800	M	SHABANI I CHANDE	12-10-15	
IMPALA	15	MS1	375	12-10-15	1430	M	SHABANI I CHANDE	12-10-15	
ZEBRA	26	LR2	375	14-10-15	1230	M	SHABANI I CHANDE	14-10-15	
ELAND	9	MS1	375	14-10-15	1300	M	SHABANI I CHANDE	14-10-15	
LEOPARD	17	MS1	375	16-10-15	1745	M	SHABANI I CHANDE	16-10-15	
LION	18	MS1	375	17-10-15	0730	M	SHABANI I CHANDE	17-10-15	
SABLE	21	MS1	375	20-10-15	1330	M	SHABANI I CHANDE	20-10-15	
DUIKER	8	MS1	375	20-10-15	1800	M	SHABANI I CHANDE	20-10-15	

DECLARATION TO BE SIGNED BY PERMIT HOLDER AND OFFICER TO WHOM PERMIT IS SURRENDERED

I (Name) Harold Delamarter hereby declare that the register of game killed is a true record of all animals killed or wounded by me during the validity of this permit

MKUU WA KAND... KANDAYA KASK. MASHARIK... KM ANIBALA SELOU... MNGUPIRA

Kny. 21/10/2015

PERMIT / CERTIFICATE 166164

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

☐ EXPORT
☐ RE-EXPORT
☒ IMPORT
☐ OTHER

ORIGINAL

2. Valid until 23/04/2017

3. Importer (name and address) Mr Harold Delamatre
C/o Oxi Logistics (Pty) Ltd
Erasmia PRETORIA

4. Exporter / Re-exporter (name, address and country)
Luke Samaras Safaris LTD
Dar. Es. Salaam
TANZANIA

3a. Country of import RSA

5. Special conditions: Invalid without attached permit conditions (page 2 of 2) TZ 29932 dd 12/10/2016 Integrated permit 2016 attached

For live animals, this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations. Permit / certificate valid for one consignment only.

6. Name, address, national seal / stamp and country of Management Authority

Department of Environmental Affairs
Private Bag X447
PRETORIA
0001
SOUTH AFRICA

5a. Purpose of the transaction (see reverse) H

5b. Security stamp No. 1357009

	7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age/sex) if live	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported / quota
A	7.8 (Panthera pardus) Leopard	9. Skull	10. IW	11. 1(one)	11a.
	12. Country of origin* / Permit No. / Date / 12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ** or date of acquisition ***	
B	7.8 (Panthera pardus) Leopard CITES TZ 2015 NO. 000108500	9. Fullskin	10. IW PAR	11. 1(one)	11a.
	12. Country of origin* / Permit No. / Date / 12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ** or date of acquisition ***	
C	7.8 (Panthera leo) Lion	9. Skull	10. IIW	11. 1(one)	11a.
	12. Country of origin* / Permit No. / Date / 12a. Country of last re-export / Certificate No. / Date			12b. No. of the operation ** or date of acquisition ***	
D	7.8 (Panthera leo) Lion	9. Fullskin	10. IIW	11. 1(one)	11a.
	12. Country of origin* / Permit No. / Date / 12a. Country of last re-export / Certificate No / Date			12b. No. of the operation ** or date of acquisition ***	

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes
*** For Pre-Convention specimens

GAUTENG PROVINCIAL GOVERNMENT DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
24 OCT 2016
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769 JOHANNESBURG 2000

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: P. Mthembu

Pretoria — Place
24/10/2016 — Date

1357009

14. EXPORT ENDORSEMENT:

Block	Quantity
A	1 (ONE)
B	1 (ONE)
C	1 (ONE)
D	1 (ONE)

15. Bill of Lading/Air Waybill Number: 083 9016 3622

Port of Export — Date

Security stamp, signature and official seal
Department: Environmental Affairs
REPUBLIC OF SOUTH AFRICA
Cancelled by an Environmental Management Inspector
ANNEMAN — Name in Print
04/02/2017 — Date
Signature
Signature — Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 166164

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

January 16, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over $51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another $5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km^2. Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes $73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.

- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for one permit to import a lawfully hunted African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: Charles B. Waibel

Date: 12-27-17

RCVD FEB 2 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
WAIBEL	CHARLES	BRADLEY	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
POWELL BUTTE	OR	97753	CROOK	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: UN SURE OF # No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible] nal penalties of 18 U.S.C. 1001.

(b) (6) 12-27-17
Signature Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      All parts including skin, skull, teeth, and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      Zambia, Munyamadzi / Nyampala Game Management Area, GIS: S 12 38 59.7; E 032 03 37.9

   b. Date wildlife was hunted:

      July 5th, 2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Full Skin, skull, teeth, claws and floating bones.

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Plot 10549, Lumumba Road, Lusaka, Zambia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Baobab Safaris
Business Name:	Baobab Safaris
Address:	Plot 133
Address:	Freedom Way, PO. Box 34272
City:	Lusaka
State/Province:	Central Province,
Country, Postal Code:	Zambia

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.
Please see information provided by Conservation Force, Zambian authorities, Zambian operators, and others.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) _____ Date: 12-27-17

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ENHANCEMENT REPORT

BAOBAB SAFARI COMPANY, LTD.
Plot 133 Freedom Way Road, Box 34272, Lusaka.
huntnyampala@gmail.com
Nyampala Munyamadzi Game Management Area, Zambia

I. DESCRIPTION OF COMPANY AND CONCESSION

Baobab Safari Limited has been operating in Nyampala Munyamadzi Concession since 1993 after a ban for almost three years. The concession is 2185 km² and provides habitat for a range of species including buffalo, lion, leopard, hippo, Waterbuck Common, bushpig, kudu, roan, eland, reedbuck, crocodile, grysbok, impala, bushbuck, hyena, warthog, puku, zebra, hartebeest, Wildebeest Cookson and Elephant (lion and lion prey). Our concession is in Nyampala Munyamadzi Area and it has been categorized as a prime area by our Wildlife Authority. We have a lease with the Wildlife Authority for seven years, renewable.

Our company is family-owned and has been operating in this country for 30 years. We employ four professional hunters, 6 game trackers, 30 anti-poaching scouts, and six camp staff (cooks, waiters, cleaning, miscellaneous). **Altogether our operations support at least 150 dependents in local villages.**

We have a written concession plan with anti-poaching and community components.

II. ANTI-POACHING COMPONENT

Our concession agreement requires that we have an anti-poaching program/plan and report about it to the Wildlife Authority. The Wildlife Authority considers our contributions in determining whether to renew the concession.

A. Law Enforcement

Baobab Safari Limited is very much aware that law support enforcement is very cardinal, to enable the officers from the Wildlife Authority on the ground carry out patrols in order to ensure the

hunting block is well protected from poaching activates. To this effect the outfitter has committed to pay the sum of US$61,000.00 to be shared among one Community Resource Board in the area.

B. Fire Management

The outfitter is committed to pay the sum of US$2,750.00 towards the management of fire in the hunting block. The outfitter has further committed to provide transport to assist the department of wildlife and the community to curb fires and management of early burning activities.

C. Scouts Management

We supply rations once per month to the scouts to ensure they are sufficiently equipped for the patrols.

Since operations from late June 2015. During the opening season of 2016, we have physically seen elephants and a lot of movement in and around the camp. Physical presence of the scouts in and around the camp has made a positive response.

From late November 2016 to date:

Item	Spend (USD)	Notes
Scout salaries	3,000.00	Law enforcement, fire control
Scout equipment	-	Infrastructure development,etc
Diesel / petrol	1,500.00	Total contribution: $35,000.00
Rations for WA and community scouts	2,500.00	
Wage for the driver	1,000.00	
Wages for monitoring team	1,000.00	
TOTAL	**US$9,000.00**	

D. Distribution of meat to the Community

The outfitter also distributes edible carcasses to the community as a measure to reduce poaching by the community. A minimum of 50% of hunted meat is distributed to the community and it is shared amongst them through their community resource boards by a liaison officer who is employed by the outfitter.

E. Road Clearance

The outfitter also sends out road crews approximately every two weeks to check the condition of the roads in the concession, as a way of ensuring that the patrol of the area is done effectively.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

Baobab Safari Limited is committed to pay about US$73,500.00 to the Community Resource Boards.

The outfitter has further committed to pay the sum of about US$11,500.00 towards infrastructure development and maintenance.

The Outfitter has also constructed a tented Safari Camp on the Mutinondo River which is also creating employment for the locals and helping in anti-poaching.

Further more the outfitter is committed to pay US$7,500.00 towards the resource monitoring to enable that all the available resources on the ground are well monitored.

IV. OTHER INFORMATION

Prey Base

Baobab Safari Limited's anti-poaching efforts and fire management have allowed the lion prey base in our concession to grow over the past year. We estimate that our Lion and Leopard would increase by 10%.

Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, ABC Safari Company maintains a Google Earth database of lion sightings and tracks. We record sightings, spoor, or footprints and as much data is known on the individual. Because we keep tabs on the lion in our concession, we are assured that the regulated, limited offtake is sustainable.

Lion Aging Approach

Baobab Safari Limited has been following an age-based policy for African lion trophies since 2016, we have adopted a company rule not to harvest lion below six years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective. We successfully harvested mature (aged six of older) male lion up to our quota (of two).

Lion Hunting Revenue

Lion and Leopard are our highest-value species. We require 21-day safaris for lion and Leopard require 14 day safaris. Our daily rate is US$1,800.00 per day, plus a trophy fee of $15,000 (lion) and $6,500 (Leopard).

We generate approximately 85% of overall revenue from lion and Leopard hunts, and approximately 50 % of our annual revenue from lion hunts alone.

U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

Baobab Safari Limited regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

All Lion and Leopard hunts are studied and scrutinized on camera to determine their age and size before they are actually shot.

Lions are seen on almost daily basis indicating a healthy growing population. Only 1 Lion is on quota.

Signed: R. Nandus

Operator Name: Baobab Safaris Limited

Title: Director

LEOPARD AND LION HUNT RETURN FORM

(Each animal hunted should be accompanied by a separate data sheet and all measurements should be in metric units)

Name of Professional Hunter: MARK. A. SWANEPOEL | Monitoring Scout: catherine Chiluba | Rank: S. Scout

DETAILS OF CLIENT

Name of client: BRADLEY. C. WAIBEL | Nationality: USA

Country of Residence: USA

Address: USA

GMA permit No: 23871 | Non Resident Hunting Licence No: (23871) → 21889

DETAILS OF HUNT AND TROPHY MEASUREMENTS

Name of GMA:	MUNYAMADZI / NYAMPALA	Hunting period	
Name of Hunting Block:	NYAMPALA	From (Date): 28-06-17	To (Date): 28-07-17

Date Killed or wounded	Species	Killed or Wounded	Sex (Tick)		GPS Location (in decimal degrees - hddd.ddddd°)	
					Latitude	Longitude
05-07-17	LION	KILLED	Female	Male ✓	S12°38 59.7	E032°03 37.9

Date measured (DD/MM/YY)	Total length (Nose to tip of tail - cm)	Tail length (cm)	Shoulder height (Shoulder to base of paw in cm)	Skull length (cm)	Skull width (cm)
08-07-17	275cm	92.5cm	85cm	37.6cm	23cm

PHOTOS & SAMPLES (tick in space provided for photos & samples taken)

1. Whole body from the side*	✓	7. Teeth before cleaning (front & side)*	✓	12. Ridges on back of Lower canines	✓
2. Mane from the top*	✓	8. Teeth after cleaning (front & side)	✓	13. Tissue samples taken	
3. Face & head from the top*	✓	9. Lower Jaw from side	✓	14. Premolar extracted	
4. Face & Chest*	✓	10. Ridges on back of Upper Canines	✓		
5. Nose*	✓	11. Whisker spots (Right & Left)	✓		

*These photos should be taken at kill site before skinning and in as good of light as possible. Teeth and nose should be blood and dirt free to provide clear assessment

DATA RECEIVED BY: **DATE:** **SIGNATURE:**

REPUBLIC OF ZAMBIA

The Zambia wildlife Act
(Act No . 12 0f 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

21389

NON RESIDENT HUNTING LICENCE

(Regulation 3 (2)

Station of issue: Chilanga Date of issue: 22/6/17

DETAILS OF LICENSEE

Full Name: BRADLEY WAIBEL NRC/Passport No. (b) (6) [redacted]

Nationality: U.S.A Tel/Fax:

Addrsss:

Full Name of Safari company: Baobab Saf

Company Cert. Incorporation No: Date of incorporation:

Postal Address: (b) (6) [redacted]

Residential Address:

Firearm Licence/Tourist`s Firearm import No: Caibre of Firearm(s):

Type of Hunt: Hunting Block:

Ref 7362341

The above named Safari company and its bona fide Clients are authorised by this licence under the Guidance of a Professional hunter to hunt the follwing Game or Protected animals within the Game Management Area or hunting block Specified hereunder and for the specified period and upon payment of the fees specified below

Species of animal	Number	Sex	Hunting Area	Hunting Period	Fees US$
Lion	1st	M	Nyampada	2017	
			Mfuwe South		

Total Animals Fees	
Concession Fees	/
Grand TOTAL	

Note:
Original copy to be retained by the Licencee
Duplicate copy to be forwarded to the Director General or to an agent
Triplicate to be retained in the book

DEPARTMENT OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
22 JUN 2017
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA

Date: 22/6/17

Director General

No. 12035

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 12 of 1998)

Form ZAWA 14

The zambia wildlife
(Licences and fees) Regulations, 2003

RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTIING LICENCE
(Regulation 6)

DETAILS OF PROFESSIONAL HUNTER

Full Name: MARK. A. SWANEPOEL NRC/Passport No: (b) (6) [redacted]

Safari Company on behalf of which the Professional hunter is submitting this return: BAOBAB SAFARIS

DETAILS OF CLIENT

Full Name: BRADLEY. C. WAIBEL NRC/Passport No: (b) (6) [redacted]

Postal Address: (b) (6) [redacted]

Non Resident Hunting Licence No: 23871 Date of issue: 22-06-17

Name of Hunting block hunting was conducted MUNYAMADZI / NYAMPALA GMA

Hunting period: 28-06-17 to: 28-07-17

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export Yes	Trophy for Export No	Foreing currency value charged to client
04/07/17	HIPPO/MALE	ONE	–	S12°6635.9 E032°0975.9 ✓			#21891
05/07/17	COOKSONS WILDEBEEST/MALE	ONE	–	S12°3110.1 E032°0547.7 ✓			#18189
08/07/17	LION/MALE	ONE	–	S12°3859.7 E032°0337.9 ✓			#21889

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Lenth of Horn
HIPPO		24"	
C/WILD		26"	
LION		25"	

DETAILS OF PAYMENTS MADE

Type of payment	Currency	Amount
Amount of foreign currency paid by the client directly to the Safari Co. for the services rendered by the Co. including overheads & Extras.		
Amt of foreign currency paid by the Saf Co. On behalf of the client to the DG for animals, Licences and Hunting rights		
Total Amount Paid		

Verification by (a) Client: I certify that the animals listed on this return were hunted by me during the period stated and the total amount of foreign currency stated and paid by me to the Safari Company is the full amount I was charged

(b) Professional Hunter: I certify that the animals listed on this return were actually hunted by the client in accordance with the terms & conditions of a Non Resident Hunting Licence & that the foreign currency stated above is the full amt. Paid by the client for the hunt

Date: 08-07-17 Signatures: Client

Professional Hunter

Wildlife Police Officer

White copy to the Director General - ZAWA
Yellow copy to the Safari Company
Blue copy to be retained by Professional Hunter

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-75475C

Enhancement Finding
Applicant: Charles Bradley Waibel (PRT-75475C)

Charles Bradley Waibel submitted an application on February 2, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 5, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Waibel's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Nyampala GMA, Munyamadzi, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Waibel's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Waibel's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Waibel's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Waibel's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Waibel's will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Waibel's, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Waibel.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Charles** (b) (6) **Waibel.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA75475C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHARLES BRADLEY WAIBEL
(b) (6)
POWELL BUTTE, OR 97753
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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February 21, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

FEB 26 2018

Re: Applications for Import of Sport-Hunted Lion and Leopard Trophies

Dear Chief Van Norman:

Enclosed please find three applications to import sport-hunted lion trophies and one application to import a sport-hunted leopard trophy. These applicants will hunt in the Savé Valley Conservancy in 2018. This conservancy is well known for their excellent wildlife management, including management of lion and leopard. The conservancy maintains increasing carnivore populations subject to a local management plan, and conservative offtake quotas. Regulated hunting revenues are reinvested in wildlife management and protection, including 30-40 highly trained anti-poaching that protect the conservancy's large black rhino population. We respectfully request that you consider the enclosed information and the information submitted by Zimbabwe's Parks and Wildlife Management Authority and Conservation Force, including the lion hunting report dated January 31, 2016, in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

(b) (6)

Name: JEFFREY S CAMPAGNA

Date: 2/15/18

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

FEB 2 6 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Campagna	Jeffrey	D	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6 Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Moline	IL	61265	Rock Island	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible]rein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

otocopied or stamped signatures)

2-15-18
Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo melanochaita/African Lion

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe/Save Valley Conservancy/20deg,28'40"S - 32deg,14'55"E/Humani Ranch/Chiredzi (nearest town)

   b. Date wildlife is to be hunted:

      June/July of 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      Complete skin (including claws), Skull (including teeth)

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Rd
Address:	Belmont
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calend[redacted] into the United States, cannot be r[redacted]

Applicant's [redacted] Date: 2/15/18

Be aware t[redacted]al or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information. Fedex account # (b) (6) [redacted]

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

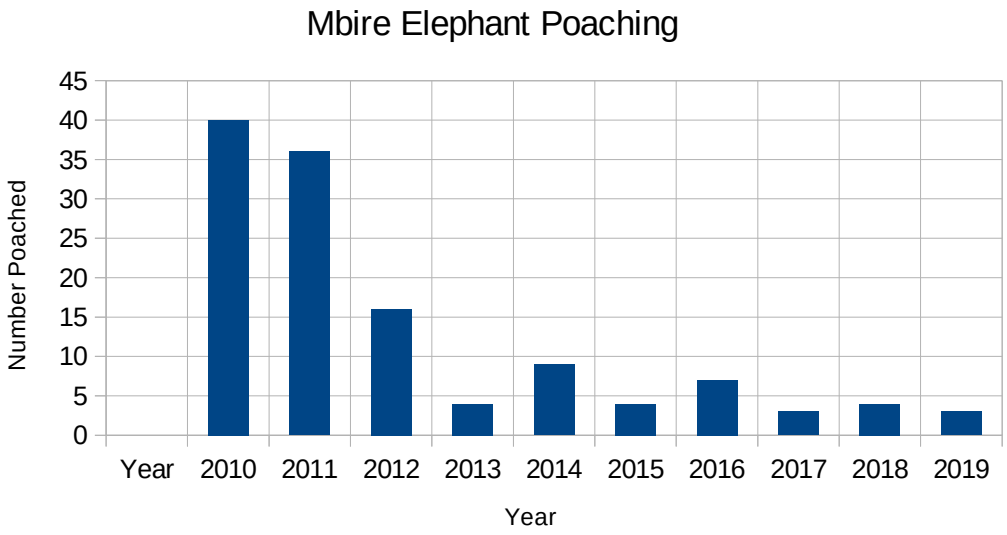

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

From: King, Jenna D
To: cf@conservationforce.org
Cc: Brisendine, Amy
Subject: FWS Permit Application No. 78386C
Date: Friday, August 14, 2020 1:23:55 PM

Hello,

This email is in regard to the FWS permit application #78386C for Jeffrey Campagna to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place in June or July 2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000080469
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Tredelk Trading (Pvt) Ltd	**Client's Full Name**	Jeffrey Campagna
ZTA (HOP) No.	HOP0304	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	11 Hazeldene Road Borrowdale Harare	**Address**	(b) (6) Moline IL 61265
Name of Professional Hunter	B COATON	**Licence No.**	070
Telephone		**Fax**	0
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	**Address**	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	**Address**	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent		**Address**	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Humani	Masvingo	
2	Bedford	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	13-06-2018
Date of Safari To	30-06-2018
Daily Rate Charged For Big Game USD	2,000.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	04-JUL-2018	DMS/15411	27-AUG-2018	USD	69,096	69,096
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	36,611.00	**Total Guests rate**	.00
Less Commission	.00	**Total Trophy fees**	30,550.00
Other fees (Incidentals)	1,935.00	**Grand Total USD**	69,096.00
Percentage Commission Charged	.00	**Total Processing Fees**	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	IMPALA	M	Killed	Bedford	206421	15-JUN-2018		250
2	IMPALA	M	Killed	Bedford	197425	15-JUN-2018	56 1/2"	250
3	BUFFALO	M	Killed	Bedford	190408	16-JUN-2018	100"	5,000
4	GIRAFFE	M	Killed	Bedford	111452	15-JUN-2018		1,500
5	GIRAFFE	M	Killed	Bedford	206437	19-JUN-2018		1,500
6	LION	M	Killed	Bedford	118462	25-JUN-2018	24 1/4"	15,000
7	IMPALA	M	Killed	Humani	143280	27-JUN-2018	53 1/2"	250
8	IMPALA	M	Killed	Humani	143280	23-JUN-2018	50"	250
9	IMPALA	M	Killed	Humani	143280	22-JUN-2018	52"	250
10	ZEBRA	M	Killed	Humani	143280	29-JUN-2018		1,100
11	ZEBRA	M	Killed	Humani	143280	27-JUN-2018		1,100
12	WILDEBEEST	M	Killed	Humani	143280	27-JUN-2018	63"	850
13	GIRAFFE	M	Killed	Humani	169332	14-JUN-2018		1,500
14	KUDU	M	Killed	Humani	147406	23-JUN-2018	128"	1,750
15								
16								
17								
18								
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I .....hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client _____ Date _____

Signature of Professional Hunter _____ Date _____

Signature of Safari Operator _____ Date _____

From: Aimee Korver
To: King, Jenna D; (b) (6) ; John Jackson, III
Subject: [EXTERNAL] Re: FWS Permit Application No. 78386C
Date: Tuesday, August 25, 2020 3:29:38 PM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. King,

In response to your e-mail inquiry:

The date the lion was taken was June 25th, 2018. Attached you will find the hunting TRAS2 permits for this hunt.

Please let me know if you have any questions and that you have received this response.

Best regards,

Aimée Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

-------- Forwarded Message --------
Subject: FWS Permit Application No. 78386C
Date: Fri, 14 Aug 2020 17:23:54 +0000
From: King, Jenna D <jenna_king@fws.gov <mailto:jenna_king@fws.gov> >
To: cf@conservationforce.org <mailto:cf@conservationforce.org> <cf@conservationforce.org <mailto:cf@conservationforce.org> >
CC: Brisendine, Amy <amy_brisendine@fws.gov <mailto:amy_brisendine@fws.gov> >

Hello,

This email is in regard to the FWS permit application #78386C for Jeffrey Campagna to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place in June or July 2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

/In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office*within 45 calendar days of the date of this email*, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity. /

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike,MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.or <g" target="_blank" rel="noopener" data-mce-href="https://www.cites.org/eng/disc/how.php>g">https://www.cites.org/eng/disc/how.php>g <https://www.cites.org/eng/disc/how.php>

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.27 13:37:39 -04'00'

Memorandum

From: Mary Cogliano, Ph.D., Chief, Branch of Permits

JENNA KING Digitally signed by JENNA KING Date: 2020.08.26 09:19:18 -04'00'

To: Permit File PRT- 78386C

Enhancement Finding

Applicant: Jeffrey D. Campagna (PRT–78386C)

Introduction

Jeffrey D. Campagna submitted an application on February 26, 2018, for the importation of one male lion *(Panthera leo melanochaita)* taken in June 25, 2018, from the Savé Valley Conservancy (SVC), Humani Ranch, Masvingo Province, Zimbabwe, for the purpose of enhancing the propagation or survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). The rationale for our finding follows.

U.S. Permit Requirements for Import of Lions (*Panthera leo melanochaita*)

ESA

The African lion, subspecies *Panthera leo melanochaita* (southern and eastern Africa), is a threatened species under the U.S. Endangered Species Act (ESA or Act) and is regulated under a species-specific 4(d) rule, 50 C.F.R. § 17.40(r) that provides specific conservation measures for this subspecies. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions at 50 C.F.R. § 17.21 and 50 C.F.R. § 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to import or export any lion specimens.

Although import of the lion subspecies *P. l. melanochaita* is a prohibited activity under the Act, exceptions may be made in accordance with the 4(d) rule at 50 C.F.R. § 17.40(r) when

the import activity qualifies for and the Service issues an ESA threatened-species enhancement permit under 50 C.F.R. § 17.32(a). The preamble to the 4(d) rulemaking, 80 Fed. Reg. 79999, 80043-46 (Dec. 23, 2015), explains the factors the Service considers when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*, as described below.

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)), but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service will examine the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we will evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC

2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.
(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.
(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.
(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

The Service's approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. Before we will authorize the importation of a sport-hunted trophy, we must determine that the trophy hunting program is managed to ensure the long-term survival of the species. In many parts of the world, wildlife exists outside of protected areas and must share the same habitat

and compete with humans living in these areas for space and resources. If communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: Habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we would study a number of factors. Some of the factors we would consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We would consider whether the management program actively address the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We would examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. As stated previously, hunting can generate significant economic benefits if properly conducted. In looking at whether we would be able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we would examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We would also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* would be expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

As stated, under this 4(d) rule any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50

CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases for imports, such as sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. For the import of sport-hunted trophies of *P. l. melanochaita,* the Service will typically consult with the range country to the extent practicable and other interested parties to obtain necessary information.

The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, although individual import permits will be evaluated and issued or denied for each applicant. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a country-wide basis, the Service encourages the submission of information from individual applicants. We would rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

CITES

The African lion is also included in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is unlawful for any person subject to the jurisdiction of the United States to engage in international trade in CITES specimens contrary to the provisions of the Convention, the ESA, or our CITES implementing regulations in 50 CFR part 23. 16 U.S.C. § 1538(c)(1), (g); 50 C.F.R. § 23.13. As required by CITES, export of a specimen of an Appendix II species to another country requires prior issuance of a CITES permit. Under CITES, importation of an Appendix II species does not require issuance of an import permit from the importing country. Consequently, the United States is not required to issue a CITES permit in order for U.S. hunters to import their sport-hunted lions. In compliance with CITES, the United States does require CITES imports to meet all CITES requirements, including that the imported lion trophies be accompanied by the required CITES export permits issued by the exporting countries, *see* 50 C.F.R. §§ 23.20; 23.23; 23.24; 23.26; 23.27, and including requirements for sport-hunted trophies at 50 C.F.R. § 23.74.

Individual Permit Adjudication Considerations

When the African lion listing under the ESA became effective, January 22, 2016, the Service began issuing enhancement findings for *P. l. melanochaita* on a countrywide basis, as had been the practice for a number of other threatened sport-hunted species. On March 1, 2018, however, in response to a D.C. Circuit Court opinion (*Safari Club Int'l v. Zinke*, 878 F.3d 316 (D.C. Cir. 2017)), the Service withdrew its countrywide enhancement findings for a range of species, including lions, across several countries, and began assessing applications to import sport-hunted trophies of these species on an application-by-application basis. These withdrawals were upheld in a D.C. Circuit Court opinion (*Friends of Animals v. Bernhardt*, No. 19-5147 (D.C. Cir. June 16, 2020); *Center for Biological Diversity v. Bernhardt*, No. 19-5152 (D.C. Cir. June 16, 2020)). No countrywide ESA enhancement findings are currently in effect. Therefore, since March 1, 2018, the Service has been making

ESA enhancement findings for the import of sport-hunted trophies of lions on an application-by-application basis, ensuring consistent application of the regulatory criteria across all permit application adjudications and ensuring that each permit decision is based on the best scientific and management information available.

Although the Service makes the required enhancement findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, information obtained for the range country as a whole is also considered, as it is pertinent to the Service's evaluation. In addition to considering national-level species management, we also consider species management and contributions to species enhancement on a smaller-scale (e.g., at the regional or hunting management unit scale such as at the hunting operator, community conservancy, concessionaire, reserve, or ranch-level scale). In addition, we consider how the hunter's personal involvement in the hunting experience directly or indirectly contributes to enhancement of the species in the wild. In its enhancement evaluation, the Service, therefore, considers efforts made by the hunting management unit and/or individual hunter to directly or indirectly address the threats posed to lions in the wild together with other information available concerning the overall management and population status of the lion in the range country at the time of the hunt.

In making ESA enhancement findings, we review all relevant information available to us, including information submitted with the individual permit applications, information received in response to inquiries we make of the range countries, and all other reliable information we receive from interested parties, such as species experts, hunting organizations, hunting operators, community groups, and non-governmental organizations. We evaluate and consider all relevant information obtained or submitted to the Service on an ongoing basis as it relates to permit applications received for import of sport-hunted trophies of *P. l. melanochaita*.

The Service considers information at these different levels in order to assess:

1) How the range country government manages the hunted species and how hunting serves to enhance the survival of the species in the wild in the context of the management system;
2) How hunting serves to enhance the survival of the species in the wild in the context of the management unit at the hunting operator, concessionaire, community conservancy, reserve, or ranch level; and
3) How the individual hunter has contributed (where the hunt has already taken place) or will contribute (where the hunt has not yet taken place) to enhancement of survival of that species through their hunting activities and contributions to the survival of the species in the wild associated to the hunt and subsequent import.

Government-Level Factors Considered

- Enforcement of wildlife laws and regulations, particularly with regard to the range country's ability to implement wildlife regulations developed for the hunted species
- Implementation of a scientifically-based management plan that addresses the major threats to the species and provides economic incentives for local communities to conserve the species
- Investment of hunting fees into conservation, including whether the range country has standard processes and infrastructure in place to ensure an effective transfer of hunting revenues back into the country's management of the species and community benefits
- Management of human-lion conflict, including whether the range country has a compensation scheme or other incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions
- Management of the lion's prey base by addressing poaching or unsustainable offtake of the lion's prey species
- Management of lion hunting areas through a system that ensures the long-term survival of the lion, its prey base, and habitat
- Protection of lion habitat through establishment of protected areas, ensuring adequate protection from human encroachment and providing incentives that encourage habitat protection by private landowners and communities
- Establishment and use of science-based quotas, a sex and age-based harvest system, and a monitoring program for the lion and its prey species

Hunting Management Unit-Level Factors Considered

- Monitoring populations of the hunted species and their prey-base
- Protecting and/or increasing the prey-base for lions in the wild
- Maximizing biodiversity of the lion's prey species
- Protecting and improving the habitat for lions in the wild to ensure maintenance of ecosystem functions and biodiversity (e.g., creating water holes, habitat management, etc.)
- Engaging in anti-poaching activities for lion and their prey base
- Managing human-lion conflict
- Investing in community benefits and employment, where such investments provide incentives for conservation of lions in the wild
- Complying with harvest laws and regulations
- Re-investing hunting fees or other contributions associated to lion hunting to a fund that supports conservation of lions in the wild

Hunter-Level Factors Considered

- Complying with harvest laws and regulations
- Paying hunting/import-related fees or other contributions associated to lion hunting that are re-invested to support conservation of lions in the wild (e.g., funding habitat protection for lions in the wild, protection of the lion's prey base, or mitigation of human-lion conflict)
- Participating in a hunting program with an operator that supports sustainable use of the species

This application-by-application permit review process offers an opportunity to incentivize hunting in concessions, conservancies, reserves, or ranches that support conservation of the species through rigorous anti-poaching programs, local wildlife monitoring activities, and compliance with government rules and regulations. By complying with our enhancement requirements, a hunter's personal import will help conserve lion populations in the wild by supporting the local communities where they hunt and promoting conservation of these species and their habitats by providing protection incentives to communities that live alongside these species.

Basis for Finding

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally in the letter, the Service referenced the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives Ver. 1.0 (09 August 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe,* and subsequently, on November 29, 2016, provided a copy of its *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe.* The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe.

Since 2016, the Service has met with officials from Zimbabwe multiple times to receive updated information on the status of and management of lions in Zimbabwe with respect to imports of sport-hunted lion trophies. For example, Service representatives met with Zimbabwe officials in January 2018 at the annual Safari Club International convention in Las Vegas, and November 2018 at the African Wildlife Consultative Forum in Uganda. In September 2018, Zimbabwe officials provided to the Service the May 2017 Zimbabwe National CAMPFIRE Stakeholder's Review and the Zimbabwe Parks and Wildlife Management Authority Strategic Plan, 2019-2023. In addition, in September 2018 the Service received a letter dated 6 December 2017 from Hon. E.D. Mnangagwa, President of the Republic of Zimbabwe, addressed to President Donald Trump, addressing the

change of administration in Zimbabwe. In this letter Hon. E.D. Mnangagwa provided assurance to the United States that Zimbabwe is politically stable and that Zimbabwe's previous conservation initiatives would be enhanced, with the previous Minister, Permanent Secretary, and Director General confirmed to remain in place.

This information provided by the Zimbabwe authorities (including verbal updates and presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), along with the Service's final rule on the lion listing under the Act and other relevant information from reliable sources, are the basis of this finding.

Governance of Lions in Zimbabwe

The legal framework for Zimbabwe's regulatory mechanism is informed by its Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). The framework is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of Zimbabwe's natural landscape and scenery. This Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. The Act enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989.

CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to

improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage, and maintain Zimbabwe's wildlife resources with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the country. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from non-governmental organizations (NGOs) or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. Poaching mainly occurs along the boundaries of protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD 5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD 20,000 (ZPWMA 2014). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD 590,000 was spent on anti-poaching efforts by the Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathern, pers. comm., as cited in Du Preez et al. 2016), and USD 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). In 2002, ZPWMA had 2,146 rangers at its establishment (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016).

Safari operators in Zimbabwe are required to be registered and licensed by the Zimbabwe Tourism Authority (https://www.soaz.net/index.php/2, accessed August 16, 2019). Operators must hold a lease or agreement on a suitable concession with an approved quota of animals. They are responsible for the official paperwork and permits connected to the hunt. Hunting operators are required by law to provide the services of a Zimbabwe Licensed Professional Hunter to accompany foreign hunters in Zimbabwe. Licensing is undertaken by the National Parks & Wildlife Authority.

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonize legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

Currently Zimbabwe is pursuing six TFCA initiatives at various stages of development. These are: Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Chimanimani TFCA; Greater Mapungubwe TFCA; Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCA (Mandisodza-Chikerema 2018, p. 34).

Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

Another provision of the SADC Treaty is that member states are required to establish management programs for the conservation and sustainable use of wildlife. Zimbabwe has met this criterion for African lions through the development of its 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA), which is still in use.

As previously mentioned, Zimbabwe is also a Party to CITES, and the African lion species is included in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before the CITES Management Authority of the country of export may issue an export permit, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild (non-detriment finding; NDF) and a finding from the CITES Management Authority that the specimens proposed for export were legally acquired (legal acquisition finding).

The ZPWMA has provided the Service with a copy of its standing CITES non-detriment finding (NDF), dated October 2016, for the export of African lion specimens. The NDF explains that lion populations in Zimbabwe are being managed sustainably for the benefit of the species and that Zimbabwe's management program for lion provides economic incentives for local communities to protect and expand lion habitats. The NDF document provides information to support the following:

- The Zimbabwe hunting industry is based on sound scientific information, provides mechanisms to arrest habitat loss, or where feasible increase habitat, and provides protection from human encroachment.

- Government incentives are in place to encourage habitat protection by private landowners and communities.
- Government Incentives are provided to local communities to reduce human-wildlife conflicts.
- Hunting concessions are managed to ensure the long-term survival of the African lion and its habitat.
- Trophy hunting provides financial assistance to the ZPWMA, the communal CAMPFIRE program, and private landowners to implement wildlife management programs.
- Local communities directly and indirectly benefit from the presence of lion in their areas.
- Participation of U.S. hunters in the Zimbabwe hunting industry contributes to the overall conservation and management of lions in Zimbabwe (ZPWMA 2016).

Lion Status in Zimbabwe

When the Service listed the subspecies of lion in southern and eastern Africa (*P. l. melanochaita*) as threatened under the Act (80 FR 79999), three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement have led to poaching of the lion's prey base for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years; and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016).

A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, such as through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoPl7 *Consideration of Proposals for Amendment of Appendices I and II,* international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the

species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what level of legal trade of lion products, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas, and private conservancies dedicated to wildlife-based land use. There are approximately 319,317 km^2 of land where some form of wildlife-based land use is practiced in Zimbabwe (ZPWMA 2016). Lions occur permanently in 45% of this available range (circa 145,000 km^2) with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000 km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy, and resettled areas adjacent to the major protected areas, and lions move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys were to be done at two-year intervals in all wildlife areas, and lion call-up surveys were to be done every three years in all major lion areas (ZPWMA 2014). Although the Service has not received confirmation that these surveys have been conducted since 2015, in September 2018, the Service received Zimbabwe's Parks and Wildlife Management Authority's Strategic Plan for 2019-2023, which indicates that Zimbabwe is actively working to improve the monitoring and management of their wildlife species. In their updated strategic plan, signed in December 2018, they indicated that one of their strategic objectives is protection of wildlife resources. Their identified timeline is to update and implement key species management plans (lion is identified as one of these) by December 2023.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 5l,642 km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 - 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas, and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (SVC and BVC) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies.

Within Gonarezhou National Park, Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count

survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016).

From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100 km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014). SVC's website indicates that at SVC, an annual predator spoor count is conducted by the African Wildlife Conservation Fund (AWCF), an independent organization (http://savevalleyconservancy.org/conservation.html#header1-z, accessed August 14, 2019).

According to Riggio et al. 2013 (p. 32), and Bjorklund in Riggio et al 2013 (p. 32), the minimum number of lions that are estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe

In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in Zimbabwe's 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe,* ZPWMA provided updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan/or the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic

development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA has provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" is broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks (ZPWMA 2016).

Carnivore research programs conducted by NGOs and research institutions such as WildCRU are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, and lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and

management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and is in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange was approved. The Hwange National Park (HNP) Management Plan was updated in 2015 and officially accepted at Zimbabwe's Ministry of Environment level in 2016 (Conservation and Wildlife Fund (CWF) 2018, p. 16). One of the four components of this 10-year plan is implementation of a cooperation plan between the park and park neighbors. The Conservation and Wildlife Fund – Hwange (CWF) is a relatively new model of the private and NGO sectors in and around Hwange National Park (HNP) Zimbabwe, formalizing an alliance of individual members to materially and in-kind assist authorities with conservation work.

The Hwange Lion Research (HLR) which is part of the Wildlife Conservation Research Unit (WILDCRU), Oxford University, UK, with some financial support and collaborative effort from CWF, set up a comparative camera trap survey in May 2018, to establish a baseline of both lion and lion prey identification and densities in contiguous areas with differing management – the exact CWF project area. Although data were only obtained from the 40-day HNP camera grid, combined sources of complimentary data on the lion population in Forest Areas outside the national park suggest that anthropogenic mortality is slowing down, believed to be in part due to CWF's new law enforcement activities (CWF 2018, p. 21).

Zimbabwe's conservation strategy for lions also identifies roles and responsibilities for a number of participants in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that coordinates all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs, and coordinating data on human-lion conflicts. The strategy identifies roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and

professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under the Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

In and around Hwange National Park, data collected between 1999 and 2004 suggested that hunting surrounding the park was having a negative impact on the lion population. As a result, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and as of 2015 the population was estimated at over 550 animals (ZPWMA 2015).

<u>Hunting, Management, and Utilization of Lions</u>

In Zimbabwe, much of the trophy hunting occurs in Safari Areas which are managed mainly for the sustainable use and as buffer zones next to National Parks (Jeke et al 2019, p. 2). Trophy hunting of wildlife is legally permitted in safari areas; as of 2014, there were 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014).

As of 2016, the minimum number of lions that occur in approximately 51,642 km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 - 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non- governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old, or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016).

According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake. In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

As described above, CAMPFIRE is the program through which the Government of Zimbabwe has relegated the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however,

according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota-setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, a precautionary quota will be issued (ZPWMA 2014).

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a 5-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). However, when evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 off-take would have accounted for 0.125 lions/1,000 km^2.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program -December 2016,* a report the Service received in December 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, established the Tourism Receipts Accounting System (TRAS2) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but it required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe in collaboration with relevant stakeholders, introduced TRAS, a web-based system that links Safari operators, ZPWMA Authority, taxidermists, shipping agents, International marketing agents, and the Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information provides a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has demonstrated the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation

Jeffrey D. Campagna hunted in the Savé Valley Conservancy (SVC) in southeastern Zimbabwe, reportedly one of the largest private game reserves in Africa (https://savevalleyconservancy.org/). In the early 1900's, the 3,440 km^2 of land that now comprises the SVC was used for cattle ranching, which led to the elimination of most large herbivores and predators, including lions. In the 1990's upon establishment of the SVC, the cattle farms were converted to a wildlife-based land use system and wildlife populations were restored (Pole 1999).

In evaluating whether the importation of Mr. Campagna's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a), in accordance with our threatened species permit issuance criteria, we examined how Zimbabwe's management of lions overall as well as how Savé Valley Conservancy and Mr. Campagna himself have contributed to enhancement of wild lions both directly and indirectly by addressing the three main threats that led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict.

Below, we summarize our evaluation with reference to each of the permit issuance criteria at 50 CFR 17.32(a)(2) on the basis of information available to the Service.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport-hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in the Bubye Valley Conservancy (BVC) and the Savé Valley Conservancy (SVC) from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Without the hunting industry, protected wildlife areas such as BVC and SVC, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would likely not exist. These wildlife areas not only provide habitat for lions, but also support the lion's prey species. As previously noted, the southern portion Zimbabwe, which is dominated by SVC, BVC, and Gonarezhou National Park, supports approximately 896 lions (48% of the Zimbabwe lion population).

According to Lindsey et al. (2012), hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities and employ 186 permanent game scouts. Hunting revenues are used to support expenses associated with these activities (Du Preez et al. 2016).

The *Strategy and Action Plan* has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

As described above, we have determined that the government of Zimbabwe and the Savé Valley Conservancy contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Zimbabwe. Further, the fees garnered through Mr. Campagna's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. Sport hunting of lions by U.S. hunters such as Mr. Campagna supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Additionally, Zimbabwe appears to be transparent in its management processes, including its quota setting. In 2013, Zimbabwe proposed an adaptive age-based strategy for setting hunting quotas. This

adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders; it has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

In 2015, the development of TRAS2 allowed the country to better monitor and govern the hunting sector, including developing an effective mechanism to fully account for export proceeds from the hunting sector. The continued participation of U.S. hunters, including Mr. Campagna, in this market is anticipated to continue to maintain the viability of managing areas such as the BVC and SVC in their current form, including their contribution to conservation of lions in the wild. In 2015, lion sport-hunting generated USD 753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

After evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. Moreover, hunting areas such as BVC and SVC are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari areas, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

The participation of Mr. Campagna in the hunting and subsequent import of the trophy lion he harvested in the SVC provides an indirect benefit to wild lion populations by helping to support the reserves where lions are found; Mr. Campagna's hunt has generated revenue to help support a hunting area where lions are found and conserved. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the *Strategy and Action Plan*. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. Issuance of a permit authorizing import of Mr. Campagna's trophy lion from Zimbabwe would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport

hunting opportunities help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Considering Zimbabwe's limited, controlled off-take of lions in a manner that maintains sustainability, Mr.Campagna's legal hunt contributes to reducing the threat of extinction of lions. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* are working in concert to promote the long-term survival of lions in the wild in Zimbabwe. The use of revenue received from hunters, such as Mr. Campagna, to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe. For example, hunting operators in the SVC spend USD 546,000 annually on anti-poaching activities (Lindsey et al. 2012). Therefore, based on the information available to the Service, the issuance of the requested import permit for Mr. Campagna's legally hunted lion will likely reduce the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

Based on reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal and sustainable harvest of lions, and the subsequent import of legally harvested lion trophies, as proposed in this application, would not have an adverse effect on the species and would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Mr. Campagna submitted a permit application to import a trophy of his personally, legally harvested lion from Zimbabwe for the purpose of enhancing the propagation or survival of the species in the wild. As a sport-hunter, Mr. Campagna plays a large role in the hunting industry of Zimbabwe; the hunting and subsequent import of Mr. Campagna's trophy lion increases the funds available to the Zimbabwe Government and SVC to implement lion conservation initiatives. Therefore, based on the Service's review of the information available relating to Mr. Campagna's permit request, we find that the expertise, facilities, or other resources available to Mr. Campagna appear adequate to successfully accomplish the objectives stated in the application.

Conclusion

As described above, the Government of Zimbabwe has been documented to implement the *Strategy and Action Plan* in the manner identified in the documents referenced in making this finding. The on-going adaptive management and limited and sustainable off-take of lions is important to the survival of lions in Zimbabwe, and the funds generated by Mr. Campagna's participation contributes to the ongoing benefits the program provides to lions in the wild.

Therefore, based on the Service's consideration and analysis of the information associated with Mr. Campagna's permit application and other relevant information available to the Service, as described above, we find that the import of the lion harvested by Mr. Campagna on June 25, 2018, from the Savé Valley Conservancy, Zimbabwe, meets the requirements for making a positive enhancement finding pursuant to 50 CFR 17.40(r) and 50 CFR 17.32(a). Therefore, the Service is able to authorize the import of the trophy of one lion taken from the wild in Zimbabwe, to Jeffrey D. Campagna of Moine, Illinois.

References

Bjorklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023 /A:10247373176 95.

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://CITES.org/sites/defaul t/files/en g/cop/ l 7/prop/060216 /E-CoP l 7-Prop-04.pdf.

Conservation & Wildlife Fund – Hwange (CWF). 2018. Annual Report. 28 p.

Creel, S., M'soka, J., Droge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, and R. Mandisodza-Chikerema (2016}. Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour I 00, 22-37.

EcoWeb (2015). CAMPFIRE Hunting Income and Distribution.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *(Panthera leo)* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(I):2 19- 229.
Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Jeke, Augustine; Admire Chanyandura, Victor K. Muposhi, Daphine Madhlamoto, and Edson Gandiwa (2019). Trophy Hunting and Possible Source-Sink Dynamics in Protected Areas: Insights from Trophy Size and Offtake Patterns in Southeast Zimbabwe. International Journal of Zoology, vol. 2019, Article ID 1313927, 9 pp.
. https://doi.org/10.1155/2019/1313927.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Mamewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions.
Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undennining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org.ll0 .137 1/ jo uma l.pone.0029332.

Loveridge, A. J.; A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016) Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016) Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Mandisodza-Chikerema,Roseline (2018). Zimbabwe Parks And Wildlife Management Authority. Presentation to U.S. FWS., 37 pp.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area - Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.co m/environment/2016 / ja n/06/zimbabwe-plans-to - sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321- 3 28. doi:10.1890 /070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, 8., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salemo, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.111 l/ ele.1 2091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142 - 153. doi:10.111 l/ j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. (2006) Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991) Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219- 230. doi:10.l1 11/j.15 23-1739.199 1.tb00I 27.x

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Riggio, J., Jacobson, A., Dollar, L. et al. Biodivers Conserv (2013) 22: 17. https://doi.org/10.1007/s10531-012-0381-4.

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, 0., Hardy, 0., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications oflandscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion *(Panthera leo)* social organization in a human affected landscape. (20l0).

Traill, L., Brook, 8., Frankham, R., Bradshaw, C. (2010) Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 20I0, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera /eo /eo* and *P. l. me/anochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion *(Panthera leo)* in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non- Detriment Findings for *Panthera leo* in Zimbabwe.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Jenna King Date: August 26, 2020

Telephone Number: 850-797-1095

JENNA KING Digitally signed by JENNA KING Date: 2020.08.26 09:21:47 -04'00'

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 78386C, Jeffrey D. Campagna, has requested a permit to import a trophy of one lion that he lawfully hunted in Zimbabwe. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zimbabwe on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zimbabwe.

The requested U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zimbabwe. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

AMY BRISENDINE Digitally signed by AMY BRISENDINE Date: 2020.08.27 13:38:31 -04'00'

Signature: _____ Date: _____

[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____

List species or critical habitat unit

C. Conference required _____

List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

LION ZIMBABWE ESA TROPHY

Permit Number: MA78386C-0

Effective: 08/27/2020 Expires: 08/26/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE

Digitally signed by AMY BRISENDINE
Date: 2020.08.28 12:10:04 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JEFFREY D. CAMPAGNA
(b) (6)
MOINE, IL 61265
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Fw: [EXTERNAL] Permit # MA78386C - Misspelling of town

Brisendine, Amy <amy_brisendine@fws.gov>

Thu 9/10/2020 3:40 PM

To: Emma C. Sampson <permits@conservationforce.org>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

Hi Aimee,

We will fix the misspelling of his town and get this back to you.

-Amy

Amy Brisendine
U.S. Fish and Wildlife Service
Internaonal Aff airs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W062C
Falls Church, Virginia 22041
hp s://www.fws.gov/internaonal/permits/
hp s://www.cites.org

Please see our applicaon f orms that are available for on-line submission
here: hp s://www.fws.gov/internaonal/permits/ applicaon- forms/index.html

---

From: Aimee Korver <permits@conservaon force.org>
Sent: Thursday, September 10, 2020 9:54 AM
To: Management Authority, FWHQ <ManagementAuthority@fws.gov>; John Jackson, III <jjjiii@a.ne t>; (b) (6) [redacted]
Subject: Re: [EXTERNAL] Permit # MA78386C - Misspelling

Good Morning,
The application was submitted completely correct- this is a mistake on your part and will need to be fixed by The Fish and Wildlife Service.
I will not have the original application on hand and would have to get it from the applicant- which could take weeks to get to you and for you to actually process this.
This applicant has waited years for this permit to be issued and will not have to wait any longer for a mistake that was made by your agency.
Please correct this as soon as possible- as your mistake is costing this hunter a lot of money and time and could prevent him from even getting his trophy.
We would like to know when this will be corrected as soon as possible.
Aimée Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200
Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

On September 10, 2020 at 8:21 AM "Management Authority, FWHQ" <ManagementAuthority@fws.gov> wrote:

Dear Ind. Aimee Korver,

Thank you for your inquiry.

You will need to get the misspelling corrected. To do so, you will need to complete and send in a 3-200-52 applicaon f orm (hp s://www.fws.gov/forms/3-200-52.pdf) along with the original permit and any changes you are requesng mus t be in a signed and dated statement.

We encourage permit applicants to review our tips and reminders for completing applications.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
Reply to: ManagementAuthority@fws.gov
http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
****

New mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
MS: IA
5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From: Aimee Korver <permits@conservaon force.org>
Sent: Friday, September 4, 2020 12:32 PM
To: Management Authority, FWHQ <ManagementAuthority@fws.gov>; (b) (6)

(b) (6)

Subject: [EXTERNAL] Permit # MA78386C - Misspelling

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good Afternoon,
I am writing to inform you that our client Mr. Jeff Campagna received his issued import permit- but the city where he lives was misspelled.
Will this affect his trophy shipment in any way?
Please make the adjustment that his address is
2 Orchard Hill Boulevard
Moline, IL 61265
(This was an obvious typo- the "L" in Moline was left out- and written Moine)
Please get back to me at your earliest convenience acknowledging that you have received this .
Kindest Regards,

Aimée *Korver*
Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200
Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

LION ZIMBABWE ESA TROPHY

Permit Number: MA78386C-0

Effective: 09/10/2020 Expires: 09/09/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE

Digitally signed by AMY BRISENDINE
Date: 2020.09.10 15:45:02 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JEFFREY D. CAMPAGNA
(b) (6)
MOLINE, IL 61265
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Sign (b) (6)

Name: Eric M Tahde

Date: 02/15/2018

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jande	Eric	M	N/A

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Parker	CO	80138	Douglas	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE ***in the amount of $100, nonrefundable processing fee*** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other
hat the information submitted in this application for a permit is complete and accurate to the
erein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

02/15/2018

hotocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
      Mokore Camp, Save Valley Conservancy, Masvingo, Zimbabwe

   b. Date wildlife is to be hunted:
      October 1 - October 21, 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
      Skin and claws, skull and teeth, all parts for a life-sized mount.

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
      N/A

   b. Date wildlife was hunted:
      N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Gary Duckworth
Business Name: Mokore Safaris
Address: 7 Stable Close
Address:
City: Borowdale, Harare
State/Province:
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.
Please see information provided by Conservation Force, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 02-15-2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. *Who should we contact if we have questions about the application? (Include name, phone number, and email):*
Attorneys at Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez[†1], Dr Rosemary Groom[‡2], Olivia Mufute[§3] and Roseline Mandisodza-Chikerema[¶3]

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January 31, 2016

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

i – Banning of all lioness hunting in Zimbabwe
ii – Hunting moratoria around the Gonarezhou and Hwange National Parks
iii – Removal of fixed hunting quotas
iv – Age restrictions on sport-hunted lions
v – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
ii – Lion sport-hunting generates up to US$ 557 km^{-2}
iii – Anti-poaching (in particular that of rhinoceroses) costs ~US$ 216 km^{-2}

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

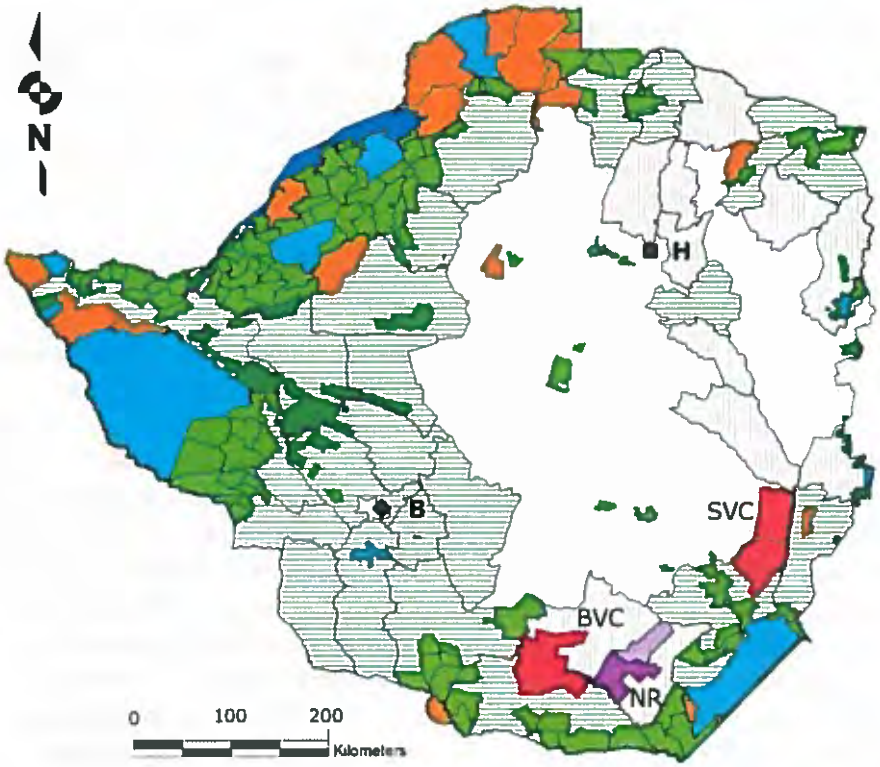

Figure 3: Map of Zimbabwe's main wildlife areas: [*i*] National Parks are represented in light blue; [*ii*] Safari areas are represented in orange; [*iii*] Forestry areas are represented in dark green; [*iv*] Community and Private wildlife areas are represented in light green; [*v*] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [*vi*] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [*vii*] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [*viii*]The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [*ix*] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: *ii*, *iii*, *iv*, *v*, *vii* & *viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

Conservation and Sport-Hunting

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

Zimbabwe's Adaptive Lion Quota Management System

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015. and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately $150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

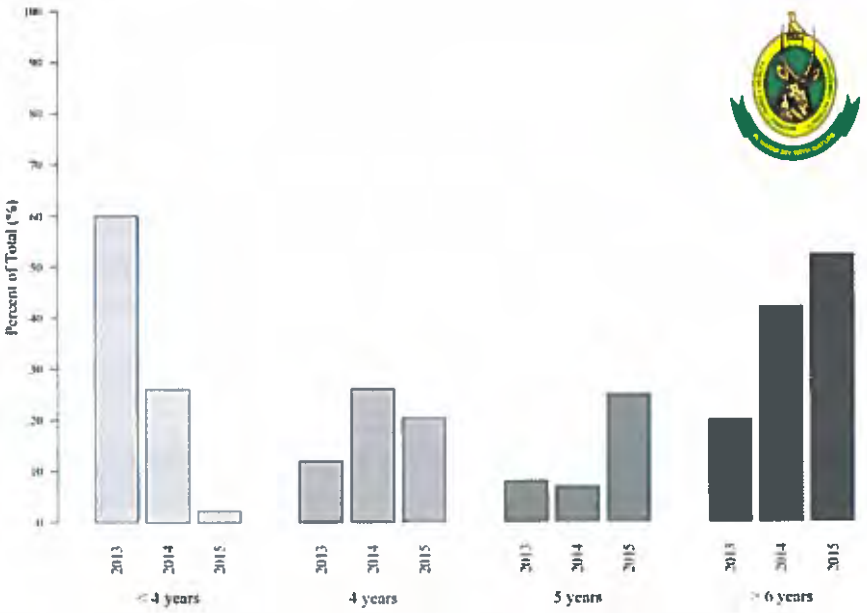

Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

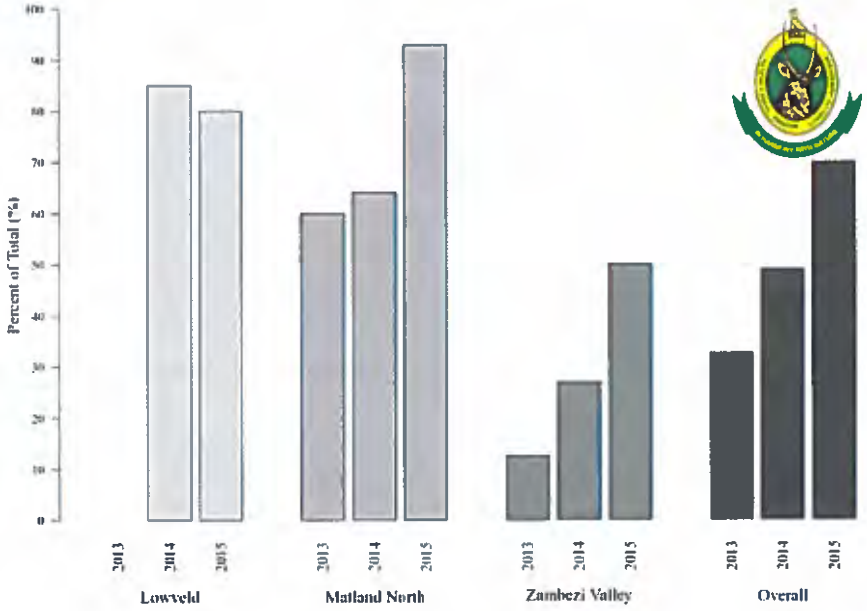

Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

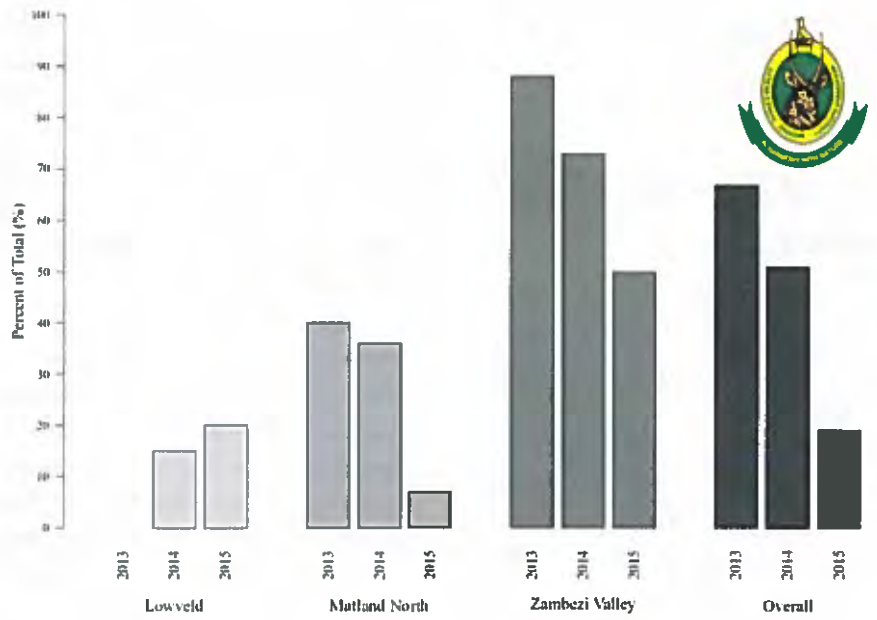

Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	*People injured*	*People Killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	44	183	*2*	*7*

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (~0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

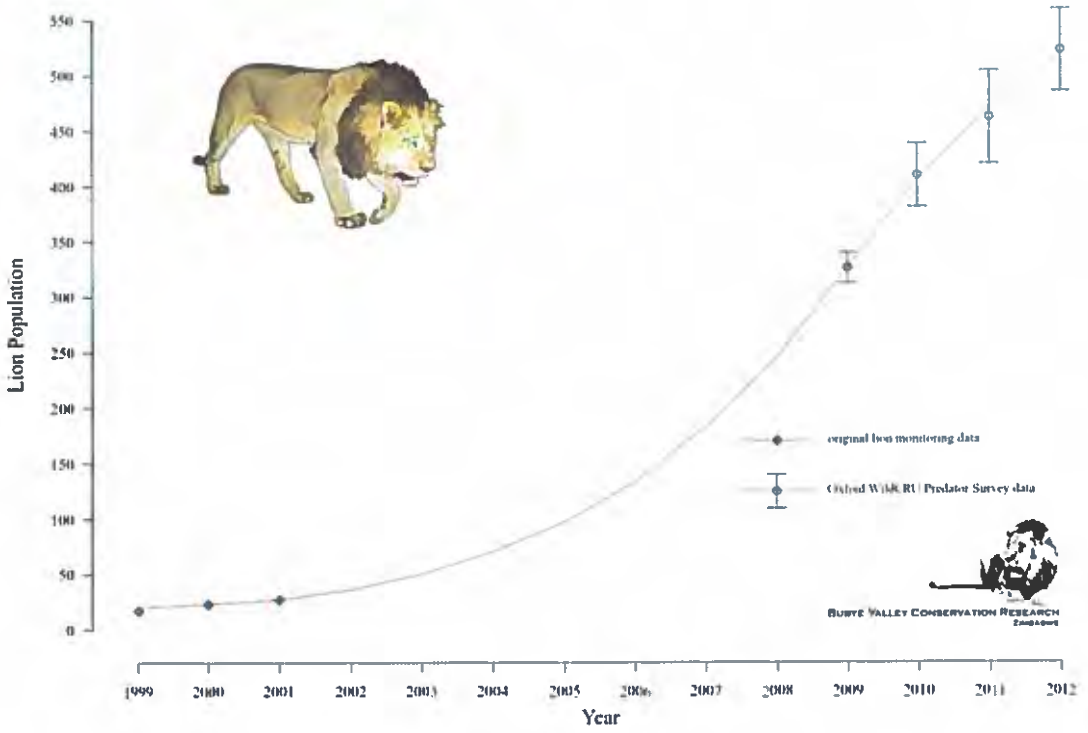

Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site
	- 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water*
	- Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.*
	- Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine
	- 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water
	- New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Beit Bridge RDC self funding projects up and running*
	- New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange
	- Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Beit Bridge & Mwenezi districts*
	- 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs andlocal headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations*
	- 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014
	- 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports*
	- Transport the soccor teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions*
	- 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC*
	- 2m security fencing supplied to Penemene School
	- Second hand door and window frames donated to Mapiri school (ex Mazunga School)
	- 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b/holes in the Vumhani area are done by BVC*
	- 26 bags of cement were donated to Mgaladivha School
	- Fencing donated to the Mgaladivha School
	- Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole
	- Water supply to Mlelezi Clinic
	- 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project*
	- 60 bags cement donated to the Welkom for repairs to a dam wall
	- 6 loads of riversand and 20 cement donated to Vumani Preschool
	- Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School
	- Supply of 24 loads of riversand to Mdzwiti School (value $1200)
	- All roofing materials supplied to Mdzwiti School
	- Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

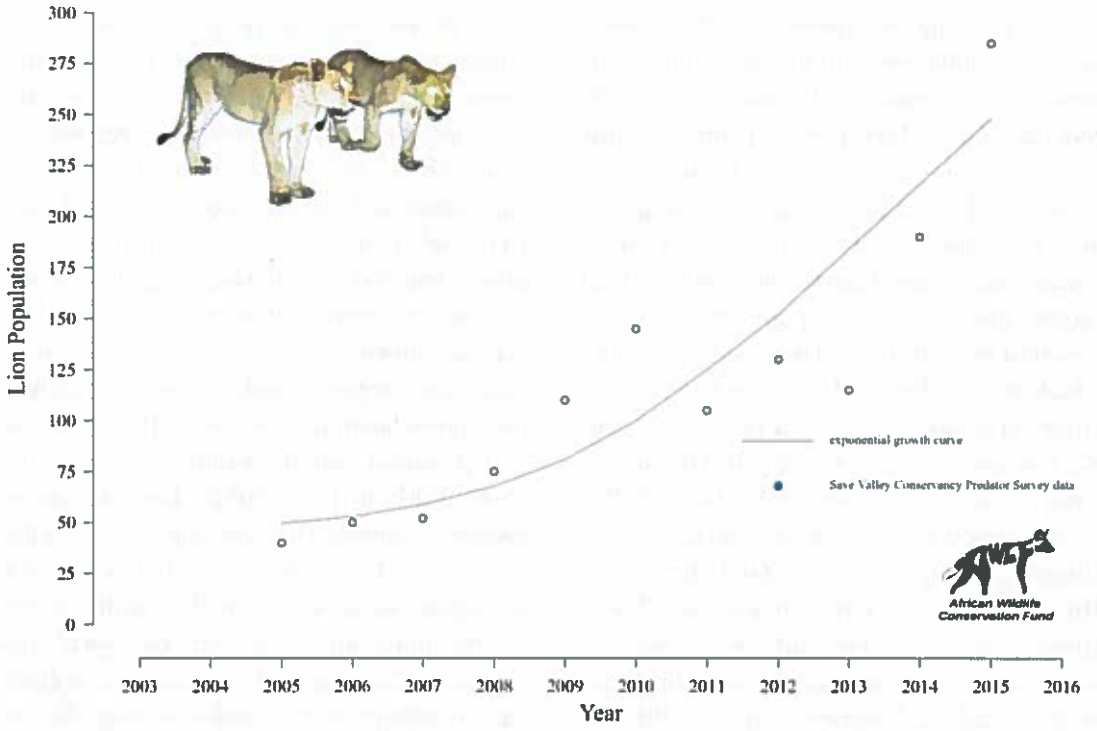

Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

The Pros and Cons of Conserving Lions

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

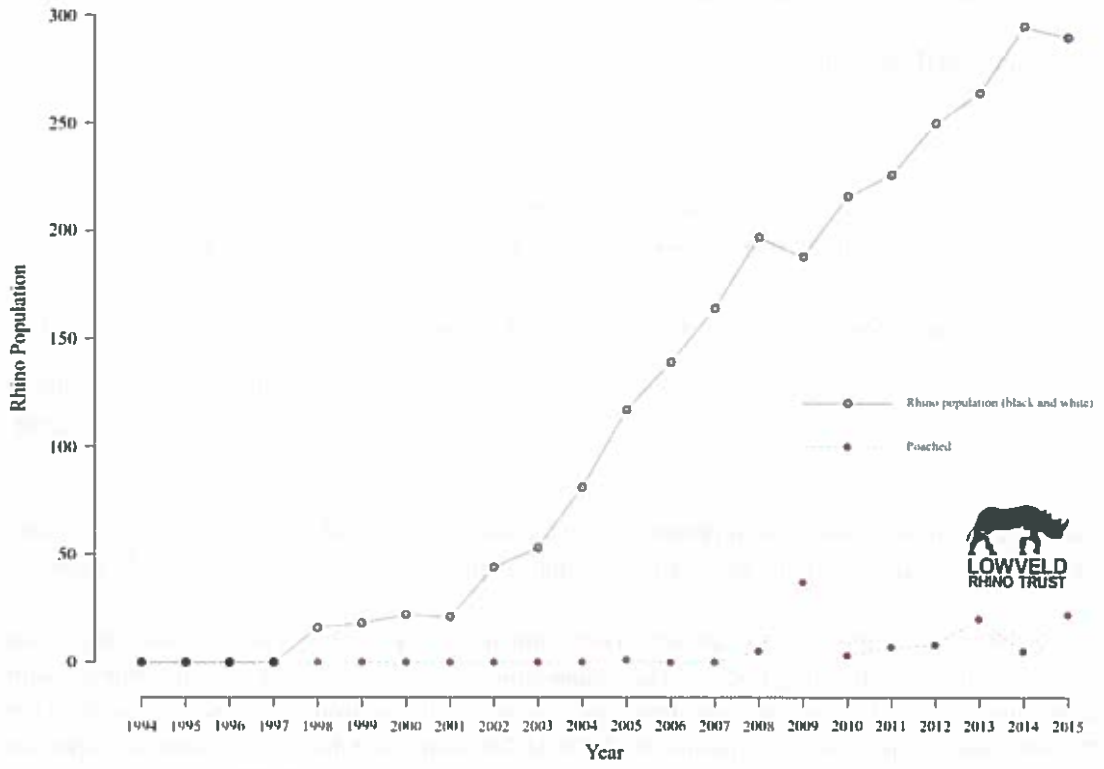

Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration: 18 days [*total daily rate of US$ 53,100 lion hunt^{-1}*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion hunt^{-1}*]

BUBYE VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 year^{-1}), research (approximately US$ 34,700 year^{-1} not including client and sponsor donations), and community support assistance (approximately US$ 210,000 year^{-1}).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZP-WMA, and that the research assists ZP-WMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

REFERENCES

Barnett, R., Yamaguchi, N., Shapiro, B., Ho, S.Y., Barnes, I., Sabin, R., Werdelin, L., Cuisin, J., Larson, G., 2014. Revealing the maternal demographic history of Panthera leo using ancient DNA and a spatially explicit genealogical analysis. Bmc Evolutionary Biology 14.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L., Macdonald, D., Packer, C., 2015a. Lion (Panthera leo) populations are declining rapidly across Africa, except in intensively managed areas. Proceedings of the National Academy of Sciences of the United States of America-Biological Sciences 10.

Bauer, H., Packer, C., Funston, P.F., Henschel, P., Nowell, K., 2015b. Panthera leo. The IUCN Red List of Threatened Species 2015.

Bauer, H., Van Der Merwe, S., 2004. Inventory of free-ranging lions Panthera leo in Africa. Oryx 38, 26-31.

Becker, M., McRobb, R., Watson, F., Droge, E., Kanyembo, B., Murdoch, J., Kakumbi, C., 2013. Evaluating wire-snare poaching trends and the impacts of by-catch on elephants and large carnivores. Biological Conservation 158, 26-36.

Bond, I., 1993. The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe.

Brassine, M.C., Parker, D.M., 2012. Does the presence of large predators affect the diet of a mesopredator? African Journal of Ecology 50, 243-246.

Child, B., 1988. The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

Child, B., 1993. Using wildlife as a development tool in Zimbabwe.

Creel, S., 2001. Four factors modifying the effect of competition on carnivore population dynamics as illustrated by African wild dogs. Conservation Biology 15, 271-274.

Creel, S., Creel, N.M., 1996. Limitation of African wild dogs by competition with larger carnivores. Conservation Biology 10, 526-538.

Creel, S., Creel, N.M., 1997. Lion density and population structure in the Selous Game Reserve: Evaluation of hunting quotas and offtake. African Journal of Ecology 35, 83-93.

Cumming, D.H.M., 1993. Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Davidson, Z., 2009. Lion ecology and socio-spatial impacts of trophy hunting in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Preez, B., Hart, T., Loveridge, A.J., Macdonald, D.W., 2015. Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

du Preez, B.D., 2014. The impact of intraguild competition with lion Panthera leo on leopard Panthera pardus behavioural ecology. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Toit, R., 1989. Proposal for Savé Valley Conservancy. Unpublished report for the Intensive Conservation Areas Committee, October 1989, Harare, Zimbabwe

Durant, S.M., 1998. Competition refuges and coexistence: an example from Serengeti carnivores. Journal of Animal Ecology 67, 370-386.

Durant, S.M., 2000. Living with the enemy: avoidance of hyenas and lions by cheetahs in the Serengeti. Behavioral Ecology 11, 624-632.

Funston, P.J., 2008. Conservation and management of lions in Southern Africa: status, threats, utilization and the restoration option, In Management and conservation of large carnivores

in West and Central Africa. eds B. Croes, H.H. Delongh, H. Bauer, pp. 109-131. Leiden, Institute of Environmental Sciences.

Funston, P.J., 2011. The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy.

Funston, P.J., Groom, R.J., Lindsey, P.A., 2013. Insights into the Management of Large Carnivores for Profitable Wildlife-Based Land Uses in African Savannas. Plos One 8.

Groom, R.J., P., W.J., 2015. Carnivore densities in the Savé Valley Conservancy: 2015. Report for the Savé Valley Conservancy.

Hayward, M.W., O'Brein, J., Kerley, G.I.H., 2007. Carrying capacity of large African predators: predictions and tests. Biological Conservation 139, 219-229.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Rickelton, M., Walker, C., Slotow, R., Skinner, J.D., 2007. Restoring lions Panthera leo to northern KwaZulu-Natal, South Africa: short-term biological and technical success but equivocal long-term conservation. Oryx 41, 196-204.

IUCN, 2006. Conservation strategy for the lion in eastern and southern Africa. IUCN SSC Cat Specialist Group, Gland, Switzerland and Cambridge, UK.

IUCN, 2015. The IUCN Red List of Threatened Species. Version 2015-4.

Jansen, D.J., Child, B., Bond, I., 1992. Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe.

Kettles, R., Slotow, R., 2009. Management of free-ranging lions on an enclosed game reserve. South African Journal of Wildlife Research 39, 23-33.

Laurenson, M.K., Wielebnowski, N., Caro, T.M., 1995. Extrinsic Factors and Juvenile Mortality in Cheetahs. Conservation Biology 9, 1329-1331.

Leader-Williams, N., Milledge, S., Adcock, K., Brooks, M., Conway, A., Knight, M., Mainka, S., Martin, E.B., Teferi, T., 2005. Trophy hunting of black rhino Diceros bicornis: Proposals to ensure is future sustainability. Journal of International Wildlife Law & Policy and Politics 8, 1-11.

Lindsey, P., du Toit, R., Pole, A., Romanach, S., 2008. Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

Lindsey, P.A., Alexander, R., Frank, L.G., Mathieson, A., Romanach, S.S., 2006. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based land uses may not be viable. Animal Conservation 9, 283-291.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Balme, G.A., Funston, P.J., Henschel, P.H., Hunter, L.T.B., 2015. Life after Cecil: channelling global outrage into funding for conservation in Africa. Conservation Letters 0, 1-6.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Romanach, S.S., Davies-Mostert, H.T., 2009. The importance of conservancies for enhancing the value of game ranch land for large mammal conservation in southern Africa. Journal of Zoology 277, 99-105.

Lindsey, P.A., Romanach, S.S., Tambling, C.J., Chartier, K., Groom, R., 2011. Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx 45, 96-111.

Lindsey, P.A., Roulet, P.A., Romanach, S.S., 2007. Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa. Biological Conservation 134, 455-469.

Loveridge, A.J., Searle, A.W., Murindagomo, F., Macdonald, D.W., 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation 134, 548-558.

Macdonald, D.W., Loveridge, A.J., Nowell, K., 2010. Dramatis personae: an introduction to the wild felids, In Biology and Conservation of Wild Felids. eds D.W. Macdonald, A.J. Loveridge, pp. 3-58. Oxford University Press Inc., New York, United States.

Miller, S.M., Funston, P.J., 2014. Rapid growth rates of lion (Panthera leo) populations in small, fenced reserves in South Africa: a management dilemma. South African Journal of Wildlife Research 43, 1-13.

Mills, M.G.L., 1995. Notes on wild dog Lycaon pictus and lion Panthera leo population trends during a drought in the Kruger National Park. Koedoe 38, 95-99.

Mosser, A., Packer, C., 2009. Group territoriality and the benefits of sociality in the African lion, Panthera leo. Animal Behaviour 78, 359-370.

Nowell, K., Jackson, P., 1996. Leopard, Panthera pardus, In Wild Cats: Status Survey and Conservation Action Plan. p. 406. IUCN, Switzerland.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., Caro, T., 2010. Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology 25, 142-153.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., Nowell, K., 2009. Sport Hunting, Predator Control and Conservation of Large Carnivores. Plos One 4.

Packer, C., Loveridge, A., Canney, S., Caro, T., Garnett, S.T., Pfeifer, M., Zander, K.K., Swanson, A., MacNulty, D., Balme, G., Bauer, H., Begg, C.M., Begg, K.S., Bhalla, S., Bissett, C., Bodasing, T., Brink, H., Burger, A., Burton, A.C., Clegg, B., Dell, S., Delsink, A., Dickerson, T., Dloniak, S.M., Druce, D., Frank, L., Funston, P., Gichohi, N., Groom, R., Hanekom, C., Heath, B., Hunter, L., Delough, H.H., Joubert, C.J., Kasiki, S.M., Kissui, B., Knocker, W., Leathem, B., Lindsey, P.A., Maclennan, S.D., McNutt, J.W., Miller, S.M., Naylor, S., Nel, P., Ng'weno, C., Nicholls, K., Ogutu, J.O., Okot-Omoya, E., Patterson, B.D., Plumptre, A., Salerno, J., Skinner, K., Slotow, R., Sogbohossou, E.A., Stratford, K.J., Winterbach, C., Winterbach, H., Polasky, S., 2013. Conserving large carnivores: dollars and fence. Ecol Lett 16, 635-641.

Pole, A., 1999. The behaviour and ecology of African wild dogs, Lycaon pictus, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland.

Pusey, A.E., Packer, C., 1987. The Evolution of Sex-Biased Dispersal in Lions. Behaviour 101, 275-310.

Schaller, G.B., 1972. The Serengeti Lion: A Study of Predator-Prey Relations. University of Chicago Press.

Smuts, G.L., 1978. Effects of Population Reduction on Travels and Reproduction of Lions in Kruger National Park. Carnivore 1, 61 - 72.

Spong, G., 2002. Space use in lions, Panthera leo, in the Selous Game Reserve: social and ecological factors. Behavioral Ecology and Sociobiology 52, 303-307.

Suzuki, Y., 2001. Drifting Rhinos and Fluid Properties: The Turn to Wildlife Production in Western Zimbabwe. Journal of Agrarian Change 1, 600-625.

Trinkel, M., Funston, P., Hofmeyr, M., Hofmeyr, D., Dell, S., Packer, C., Slotow, R., 2010. Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13, 374-382.

Vucetich, J.A., Creel, S., 1999. Ecological interactions, social organization, and extinction risk in African wild dogs. Conservation Biology 13, 1172-1182.

Wegge, P., Odden, M., Pokharel, C.P., Storaas, T., 2009. Predator-prey relationships and responses of ungulates and their predators to the establishment of protected areas: A case study of tigers, leopards and their prey in Bardia National Park, Nepal. Biological Conservation 142, 189-202.

Whitman, K., Starfield, A.M., Quadling, H.S., Packer, C., 2004. Sustainable trophy hunting of African lions. Nature 428, 175-178.

Williams, P.H., Burgess, N.D., Rahbek, C., 2000. Flagship species, ecological complementary and conserving the diversity of mammals and birds in sub-Saharan Africa (vol 3, part 3, pg 258, 2000). Animal Conservation 3, 365-365.

ZPWMA, 2015. Conservation Status of the African Lion (Panthera leo) in Zimbabwe. Unpublished Report for the USFWS.

Lion Hunting in Zimbabwe's Savé Valley Conservancy

Dr Rosemary Groom, African Wildlife Conservation Fund
(On behalf of the members of the Savé Valley Conservancy)

27th January 2013

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

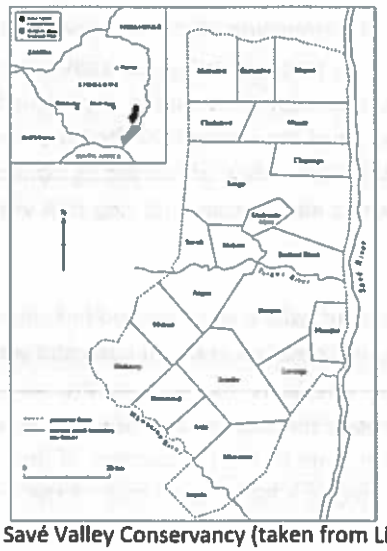

Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members then restocked the wildlife population (4410 animals; Table 1), removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	Total
African buffalo (*Syncerus caffer*)	91	88	253	40	**472**
African elephant (*Loxodonta africana*)	685	-	-	-	**685**
Black rhinoceros (*Diceros bicornis*)	-	31	-	-	**31**
Blue wildebeest (*Connochaetes taurinus*)	223	525	49	-	**797**
Burchell's zebra (*Equus burchellii*)	17	309	66	-	**392**
Giraffe (*Giraffa camelopardalis*)	36	101	44	-	**181**
Lichtenstein's hartebeest (*Alcelaphus lichtensteinii*)	-	-	-	28	**28**
Livingston's eland (*Tragelaphus oryx*)	215	263	102	-	**580**
Nyala (*Tragelaphus angasii*)	22	43	11	26	**102**
Lion (*Panthera leo*)	-	**3**	-	**10**	**13**
Spotted hyena (*Crocuta crocuta*)	-	-	-	3	**3**
Ostrich (*Struthio camelis*)	-	-	71	-	**71**
Sable antelope (*Hippotragus niger*)	49	203	122	-	**374**
Tsessebe (*Damaliscus lunatus*)	-	97	-	-	**97**
Warthog (*Phacochoerus aethiopicus*)	-	207	-	-	**207**
Waterbuck (*Kobus ellipsiprymnus*)	177	66	82	32	**357**
White rhinoceros (*Cerathotherium simum*)	-	-	-	20	**20**
TOTAL					**4410**

3 Trophy hunting versus Photo tourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings. After four years of

seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

4 Lions in the Savé Valley Conservancy

After the conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990s / early 2000s. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004-5 there were some reports of cubs. During this period 13 lions were also reintroduced into SVC. After an initial lag phase the lion population on SVC has increased dramatically and at present is growing exponentially (Figure 1, Groom 2012).

In 1993, three lions were brought into the conservancy by Humani Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the lion population is currently only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless population control measures are implemented.

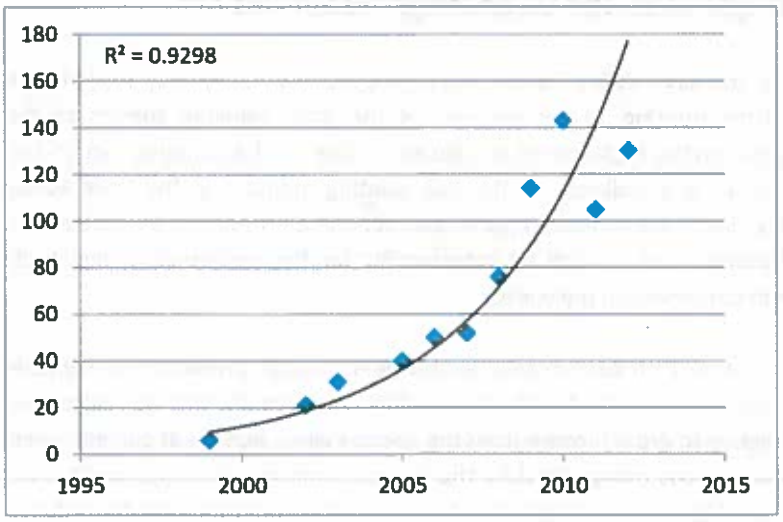

Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012).
Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100%	100%	100%	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. $2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of $10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US $1,365,000 in bed nights and $260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. $375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

It should be noted that lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed annual investments of US$ 150,000 – 240,000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). In addition, a central anti-poaching unit operates specifically to provide protection for the conservancy's black rhino, *Diceros bicornis*, population (one of only three remaining populations in Zimbabwe that is defined as having long-term viability in demographic and genetic terms). The operating costs of this unit amount to over $200,000 per year and are shared between the conservancy members and donors. As rhinos are not trophy hunted in Zimbabwe, members' share of these costs need to be generated some other way – and lion hunting is an important contributor. Thus a removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs, *Lycaon pictus*, and especially black rhinos.

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US$100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers.

The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

7 References

Becker, M., McRobb, R., Watson, F., Droge, E., Kanyembo, B., Murdoch, J. & Kakumbi, C. (2013). Evaluating wire-snare poaching trends and the impacts of by-catch on elephants and large carnivores. Biological Conservation **158**, 26-36.

Bond, I. (1993) The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe

Child, B (1988) The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. DPhil Thesis, University of Oxford, Oxford, UK

Cumming, D.H.M (1993) Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Funston, P.J. (2011) The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy

Groom, R.J. (2012) Carnivore densities in the Savé Valley Conservancy: 2012. Report for the Savé Valley Conservancy

Hayward, M.W., O'brein, J. & Kerley, G.I.H. (2007) Carrying capacity of large African predators: predictions and tests. Biological Conservation, **139**, 219-229

Jansen, D.J., Child, B. & Bond, I. (1992) Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe

Lindsey, P., du Toit, R., Pole, A. & Romanach, S. (2008) Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

Lindsey, P., Romanach, S., Tambling, C., Chartier, K. & Groom, R.J. (2011) Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx, **45**, 96-111

Pole, A. (1999) The behaviour and ecology of African wild dogs, *Lycaon pictus*, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland

du Toit, R. (1989) Proposal for Savé Valley Conservancy. Unpublished report for the Intensive Conservation Areas Committee, October 1989, Harare, Zimbabwe

du Toit, R. (1994) The Savé Valley Conservancy. In: The Lowveld Conservancies: New opportunities for productive and sustainable land use, pp. 28-36: Price Waterhouse Wildlife, Tourism and Environmental Consulting, Zimbabwe

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U.S. Fish and Wildlife Service
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Branch of Permits, MS: IA
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Falls Church, Virginia 22041

Re: Supporting information for applications PRT 84787C and PRT 78392C

Dear Ms. Barry:

Enclosed please find information to further support the enhancement generated by regulated hunting for two import permit applications that we believe have been assigned to you.

- The first, PRT 84787C, is hunting with Martin Pieters Safaris in Zimbabwe. Mr. Pieters responded to some questions about the anti-poaching and community benefits generated by hunting in the Matetsi Safari Area. Please consider this information in making a positive enhancement finding for this applicant, and please consider the Non-Detriment Finding submitted by the Zimbabwe Parks and Wildlife Management Authority (October 2016), which provides information about the benefits of regulated lion hunting in Zimbabwe's Safari Areas.
- The second, PRT 78392C, is hunting with Gary Duckworth in Save Valley Conservancy in Zimbabwe. We have previously submitted extensive information about SVC, but the operator has provided more. Among other things, this information demonstrates the operator's commitment to habitat conservation and anti-poaching, and the scientific process employed in ensuring healthy wildlife populations and sustainable use. Please note, the operator has also provided more specific information about the location of this hunt (e.g., GPS coordinates and the closest city). He has also provided the PH name. This was not initially provided because this applicant submitted the application prior to release of the new forms. Finally, the operator has corrected the "shipper" for what was question 4 and is now question 8 (the name and address of the person or business shipping the trophy). Would you please substitute this corrected information in place of Mr. Duckworth's name when the final permit is issued. Please let me know if you have questions, and please consider the enclosed information in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

CC: Acting Chief, Branch of Permits

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Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

enhancement details

Martin Pieters (b) (6) Wed, Apr 11, 2018 at 9:45 AM
To: regina.lennox@conservationforce.org
Cc: aaron Baker (b) (6), Aaron Baker (b) (6), "Eubulus Kerr (b) (6) (b) (6)

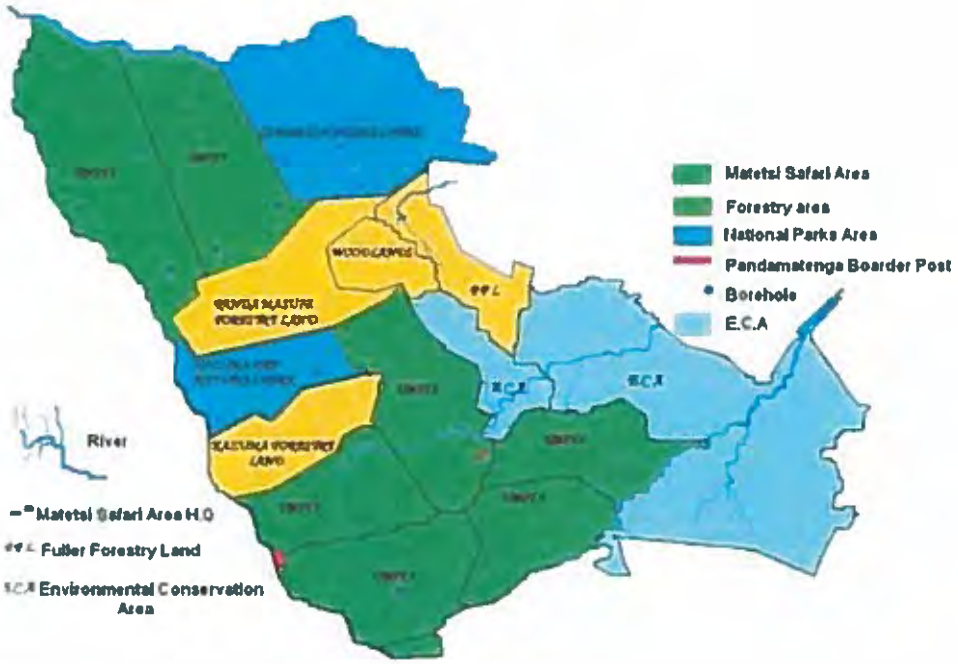
Dear Regina

Sorry for the delay.
I actually have two USA clients hunting lion, Aaron baker (b) (6) actually he has hunt shot his lion with me and will be in touch) and Eubulus Kerr (b) (6)

Both lions will be hunted in the MATETSI region which is a controlled hunting area governed by the Zimbabwe National Parks and Wildlife Authority.

1.

MAP II: MATETSI SAFARI AREA SHOWING THE SIX HUNTING UNITS, KAZUMA, PANDAMASUIE AND ICA.



2. The wildlife authority has all its own reports as they are in contra of the Matetsi safari areas.

3. The ZNPWA have been in control of the Matetsi safari areas for over 40 years and does all its own armed anti poaching as well as community assistance on its boundaries

4. For periodic reports, the ZNPWA would have all those documents.

5. Arial surveys and 48 hour game counts are conducted annually in the Hwange national park which lies

adjacent to Matetsi safari area and forestry hunting blocks.

6. Armed rangers are paid by the department of national parks and they get rewarded for successful apprehension of poachers.

7. It is a safari area hence no villages actually live in the area, the villages surround the hunting area and they benefit fro meat and off take from hunting clients which benefits them through the successful CAMPFIRE program.

8. Zimbabwe has a minimum age of 5 years with penalties to safari operators and professional hunters if an underage animal is shot.

9. Hwange National park which adjoins the matetsi block has a dedicated research team and many collared lion for research purposes. The lion population has increased dramatically over the last 5 years due to minimal quotas, successful ageing and community involvement.

10. Matetsi safari area is home to the one of the largest free ranging herds of elephant and buffalo in Zimbabwe. There are no fences and it adjoins hwange national park and Botswana where unrestrained movement of wildlife occurs.

Regards

Martin

Martin Pieters
www.martinpieterssafaris.com
(b) (6) [redacted]

DISCLAIMER: The information in this message (and any attachments hereto) may be confidential and protected from disclosure. If the reader of this message is neither the intended recipient nor an agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized disclosure of this information is strictly prohibited. Any unauthorized disclosure may cause the breaching party to be liable for damages. If you have received this message in error, please notify the sender by replying to the e-mail message, and delete it from your computer without reading it or saving it in any manner.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""

3 messages

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Subject: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""
Date: February 26, 2018 at 11:30:01 AM MST
To: (b) (6)
Cc: <permits@fws.gov>
Reply-To: <permits@fws.gov>

ERIC M. JANDE
(b) (6)
PARKER, CO 80138
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/26/2018; check number 5497 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA78392C-0

While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.

While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Regina A. Lennox <regina.lennox.cf@gmail.com> Fri, Mar 23, 2018 at 9:51 AM
To: cf@conservationforce.org

Could you possibly call and get the legal examiner's name and email for this person? Thank you!

Begin forwarded message:

From: Eric Jahde (b) (6)
Date: March 22, 2018 at 1:24:56 PM CDT

> **To:** "Regina A. Lennox" <regina.lennox@conservationforce.org>
> **Subject: Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""**
>
> [Quoted text hidden]

John J. Jackson, III <cf@conservationforce.org> Mon, Mar 26, 2018 at 11:34 AM
To: "Regina A. Lennox" (b) (6)

Case manager, biologist

Name: Ann Barry

Email: Anna_barry@fws.gov

Sorry. Called them back this morning. They never returned my call. - AT
[Quoted text hidden]
--

Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
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jjj@conservationforce.org • www.conservationforce.org

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mokore Safaris Lion Hunt

1 message

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: Regina Lennox <regina.lennox@conservationforce.org>

Hi Regina,
This is the forward of mailing from Gary Duckworth with proper info as we discussed. I will also forward the PRT mailing from the government.
Thanks very much for your help and please contact me at any time if I can help.
Regards,
Eric M Jahde
(b) (6)

Begin forwarded message:

From: Eric Jahde (b) (6)
Subject: Fwd: Mokore Safaris Lion Hunt
Date: March 21, 2018 at 5:26:00 PM MDT
To: Eric Jahde (b) (6)

Begin forwarded message:

From: "Gary Duckworth" (b) (6)
Subject: RE: Mokore Safaris Lion Hunt
Date: March 8, 2018 at 8:41:56 PM MST
To: (b) (6)
Cc: (b) (6) "'Rob Oostindien'" (b) (6) "'Neil Duckworth'" (b) (6)

Good morning Eric,

I hope this finds you well and being successful with your application. I see a recent ruling by USFW is favourable. I thought to send you some information that may help with your application. Sorry I didn't send before but forgot I had these. I have attached some notes that I had written up before. Also attached are our leopard data from Mokore just to show our healthy predator population and also the data we use to try and ensure we judge the lion's age correctly from our trail camera pictures. Also a copy of our PH rules sent to any PHs operating in our areas showing the seriousness we have to ensuring the right animals are harvested. Don, do you have any more recent counts on the SVC lions. I think he last year's count was 225. Still 75 lions above what our ecologists say is

sustainable. I have also copied in a document Neil did on Conservation Through Hunting which shows our companies dedication to these areas even though this is for Mozambique it is our company MO.

Answers that you may need from the permit application if not already done:

1. Page 3, #5 a and c.
2. Page 4, #8.
3. Page 4, #9 a, b, and c.

Page 3 5a) Mokore and Umkondo Ranches, Save Valley Conservancy, Bikita District, Masvingo Province. South Eastern Lowveld. Closest cities Masvingo and Mutare. Mokore Camp – S 20 24' 12.01" E 032 07' 01.88"

5c) Mokore Safaris, Gary or Neil Duckworth as PHs. Gary PH license number 96. Neil PH license number 94.

Page 4 8) Name: Cuan Meredith
Company: Trophy Consultants International
Address: 4 Josiah Chinamano Road, Belmont
City: Bulawayo
Province: Matabeleland
Country: Zimbabwe

9a) Please see attachments
9b) Please see attachments
9c) Please see attachments

I hope this all helps. Good luck.

From: Gary Duckworth (b) (6)
Sent: Thursday, February 15, 2018 4:12 PM
To: (b) (6)
Cc: (b) (6) 'Rob Oostindien'
Subject: RE: Mokore Safaris Lion Hunt

Hi Eric,

Thank you. Lynn will send you a list of things she needs for processing permits, etc. Good luck with the permit.

From: (b) (6) [redacted]
Sent: Wednesday, February 14, 2018 4:50 PM
To: Gary Duckworth
Subject: Re: Mokore Safaris Lion Hunt

Thank you Gary,
My application is in the works with John Jackson's help. I will wire the deposit to your account here in Mississippi today for the lion hunt in October 2018. Is there any other paper work that I need to start with you?
Eric Jahde

Sent from my iPhone

On Feb 14, 2018, at 7:35 AM, Gary Duckworth (b) (6) [redacted] wrote:

> Good afternoon Eric,
>
> I hope this finds you well. Rob had asked me to assure you that should you not get the import permit for the lion into the USA that we would either return your deposit to you or allow you to roll it over to another year or safari. All deposits are held in an account in Mississippi with our agents at African Horizons. Should your application be turned down for the import of the lion then they (African Horizons) can easily return your deposit should that be your wish. Looking at the fish and game website I am fairly confident that your application should have a positive outcome especially since the Save has not only enough lions, but possibly too many! Please do not hesitate to contact me should you have any further queries.
>
> <image001.jpg>
> <image002.jpg>

10 attachments

Kind regards

Gary Duckworth

Mokore Safaris
7 Stable Close
Borrowdale, Harare
Zimbabwe

Phone +263-(0)4-883462
Mobile +263-(0)772 260-179
skype gary.duckworth3
www.mokoresafaris.com
www.mokoreecosafaris.com

image001.jpg
30K

image002.jpg
6K

Habitat Enhancement Report- Mokore Safaris Zimbabwe.docx
20K

Leopard Data.pdf
3571K

aging_the_african_lion.pdf
5125K

Mokore Safaris PH Rules.pdf
176K

SVC Predators 2015.docx
26K

Zimbabwe Rates 2018.pdf
508K

AN EXAMPLE OF CONSERVATION THROUGH HUNTING [5741].docx
9659K

USFWS Lion Permit App.pdf
70K

Mokore Safaris (Pvt), Ltd.
7 Stable Close, Borrowdale, Harare, Zimbabwe.
Operator: Duckworth Family.
garyduckworth@mokore.com
Operating in: Save Valley Conservancy and Sengwa Research Management Area

I. DESCRIPTION OF COMPANY AND CONCESSION

Mokore Safaris has been operating in Save Valley since it's conception in late 1992. It also has been operating the the Sengwa Research Management Area since January 2013. (This is a 5 year lease with first option to roll over for a further 5 years). The Mokore Safaris section in the Save Valley is 35500 acres and provides habitat for a range of species including black and white rhino, buffalo, lion, leopard, cheetah, crocodile, wild dogs, hippo, kudu, eland, elephant, impala, bushbuck, bushpig, hyena, warthog, zebra, giraffe, waterbuck and sable (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc. Sengwa Research is 94000 acres and is home to elephant, buffalo, lion, leopard, crocodile, kudu, eland, impala, bushbuck, bushpig, hyena, warthog, zebra, reedbuck and waterbuck (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc.

Our company is family-owned and has been operating in this country since 1979. We employ three full time professional hunters, 3 part time Professional Hunters and also 48 men, 5 ladies and 2 casual labour. Altogether our operations support at least 600 dependents in local villages through our continual work on the schools, roads and dams in the neighbouring village areas. Also supplies of meat and school equipment benefits the surrounding communities.

We have a written concession plan with anti-poaching and community components....

II. ANTI-POACHING COMPONENT

Mokore Safaris maintains a 8 man anti-poaching team at an annual cost of over $60,000 in the Save Valley Conservancy and supplement Zimbabwe Parks and Wildlife Authority anti-poaching team with a vehicle driver and four rangers in the Sengwa Research Area.... Each team is equipped with a four-by-four vehicle, uniforms and boots, tents, rations, and radios. Our teams closely cooperate with the Wildlife Authority to conduct daily patrols of the concession and the neighboring properties that were taken during the land reform programme. We supply rations once a week to our scouts and assist the government game scouts in acquiring rations to ensure they are sufficiently equipped for the patrols.

We heavily patrol our areas, conducting approximately 3 patrols per day by vehicle and foot in the Save and the same again in Sengwa Research. In the past year, our teams picked up numerous snares and arrested numerous poachers hunting with dogs. Also in the Sengwa Research Area our teams with Zim Parks Rangers have arrested and also killed a number of ivory poachers. Removing snares protects the lion population by reducing incidental snaring.

We also send out road crews annually to redo the roads in the concessions, to ensure we are able to patrol effectively. These are maintained throughout the year.

In 2015, Mokore Safaris (Zimbabwe) spent approximately $100,000 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 4000 liters of diesel for patrol vehicles. We also spent $ 5500 on diesel for pumping water for wildlife in areas where there is not enough natural water for wildlife to survive. This does not include the costs of water pump and engine maintenance. And we made over $ 4000 in payments of rewards.

COMMUNITY PARTICIPATION

A. Community Assistance Component

Although there are no villages in the concession itself, we share four borders (three in Sengwa and one in Save Valley) with a heavily populated communal district. We make contributions to the two closest villages and the district council. We lease an adjacent area to the concession from the council, and pay a lease fee as well as 85% of trophy fees to the Bikita Rural District Council.

We pledge an annual contribution of at least $10,000 + in projects to the villages. We ask for a list of preferred projects at each local school and clinic. We also do the main roads annually in the Village 26, Bikita and Muchiringi Districts. We annually dredge the local dams. We supply all meat taken from any elephants harvested on our concessions to the local communities as well as supplying meat for any State Functions.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. This applies to livestock losses through predation too. We obviously try and use all means to discourage problem animals before having to take more drastic control measures.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession including over 30km of piping and 12 waterholes. We drilled, operate, and maintain two boreholes and numerous pans. Pumping costs (diesel usage only) is +-$ 5500/annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base.

V. OTHER INFORMATION

A. Prey Base

Mokore Safaris along with our other partners in the Save Valley Conservancy's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past twenty five years. Please see attached report on the game numbers increases and lion surveys report. In Sengwa research Area we estimate that our plains game (buffalo, kudu, sable, etc.) have increased by 15-20% in the last 3 years. Also, much of our anti-poaching and community assistance efforts are aimed to reduce livestock encroachment into the concession.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Save Valley Conservancy does an annual spoor survey for predators as well and an aerial survey for other species. Due to the fact that we keep tabs on the lion in our concession, we are

assured that the regulated, limited offtake is sustainable. In Sengwa Research we use trophy and age monitoring of all species hunted and manager estimates to regulate our offtakes.

C. Lion Aging Approach

Mokore Safaris has been following an age-based policy for African lion trophies since 2012, when we adopted a company rule not to harvest lion below five years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective.

D. Lion Hunting Revenue

Lion are our highest-value species. We require 21-day safaris for lion. Our daily rate is $2,500 per day, plus a trophy fee of $15000 (lion). Without this revenue plus the revenue we have already lost due the ivory import bans, our anti-poaching and habitat enhancement efforts will be seriously reduced.

E. U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

Mokore Safaris' regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

Signed: _____

Operator Name: Gary Duckworth

Title: Managing Director

Leopard Data 2015/2016

Mokore and Umkondo Ranch

Savé Valley Conservancy

Introduction

Leopards (*Panthera pardus*) are found throughout Mokore and Umkondo Ranches with in Savé Valley Conservancy (SVC). Mokore Safaris has been hunting leopard for numerous years as a form of trophy hunting or sustainable utilization. Trophy hunting consists of targeting mature male individuals, and as of more recent, individuals aging older than approximately four (4) years in age. The purpose of this document is to identify randomly selected bait sites and the leopards identified at these specific bait sites.

Method

The Professional Hunter or individual tasked with pre-baiting or baiting for leopard chose a randomly selected bait site in attempt to lure a male leopard into feeding. Due to the fact that females also utilize bait sites, records on any females feeding are also monitored. The selected bait sites are randomly chosen throughout Mokore and Umkondo Ranches. Camera traps or trail cameras are then placed at all bait sites. For identification purposes, it is attempted that all leopards captured feeding with the camera placed in such a manner that the right side of the leopard is photographed. This is however not always possible due to preferred bait site selection. It is thus recorded which side of the leopard pictures are taken of.

Male leopards are given names that aid in either easily identification of the cats or are named as per the bait site that they initially feed on. Females were named simply by property and in numerical order. For example, a female leopard feeding at the Gwezi River bait site on Mokore would be named MF001. If this female had a cub feeding alongside her, the cub would be named MJ001 and would have a recording that the cub belongs to MF001. Where MF is Mokore Female and MJ is Mokore Juvenile. The sex of each leopard was also recorded. For all juveniles the sex is recorded as unknown due to difficulties in identifying sex at a young age.

Photos are saved of all cats recorded either a right side, left side or both sides where possible. If a cat was found feeding on a different bait site, this was also recorded. An estimated age was also assigned to each male that was found feeding. The age was estimated using the Panthera ageing guidelines as well as PH age estimations.

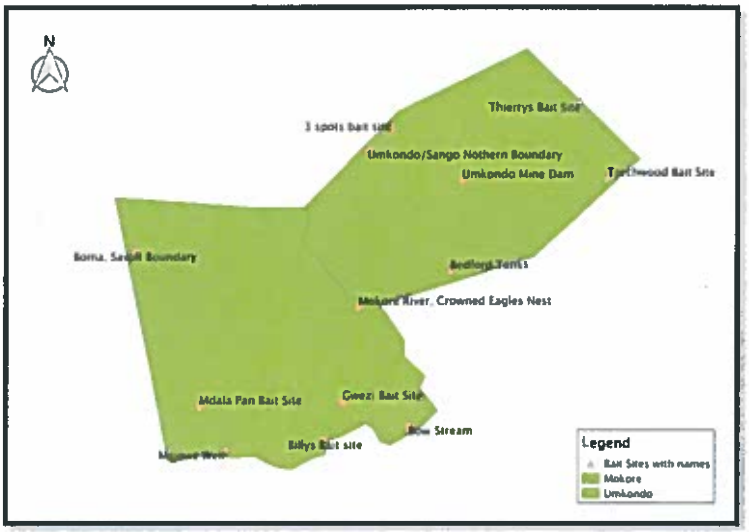


Image 1: Randomly selected bait sites throughout Mokore and Umkondo Ranches.

Results

Due to the fact that Mokore Safaris utilize two (2) properties, the data is classed into two groups, namely Mokore Leopard and Umkondo Leopard. A total leopard population is also determined due to the fact that holistically the same company treats these blocks as one management unit. It is to be mentioned that the data is based on some of 2015 and all of 2016 hunting season. Majority of the data for 2015 produced errors upon processing. However some data is made available on leopards being taken and locations thereof.

Mokore Leopard

The data gathered for Mokore is based on information gathered by randomly selected bait sites as mentioned above. It can be noted that a large portion of Mokore went without being baited, close on 2 000 ha. For the purpose of this document, this 2 000 ha was not excluded from the total area. It is hypothesized that this will have an effect on the total leopard numbers as well as leopard densities found on Mokore Ranch.

All data is separated into two classes, namely pre and post hunting. It is deemed that other males who in turn will occupy the available territory replace males removed from Mokore.

A. Pre-hunting leopard numbers and densities

Mokore Ranch is approximately 7 841 ha in size. A total number of fourteen (n=14) leopard were identified on seven (7) bait sites throughout Mokore. It can be noted that a total number of five (5) bait sites fell in close proximity to the Turgwe River. As previously mentioned, the centre and north-eastern area of Mokore was found free of baits. This does however not mean that no leopard utilize this area. A total number of five (5) males, six (6) females and three (3) juveniles were identified on Mokore.

Densities of Mokore resulted in 560 ha/leopard. Males had an average density of one (1) male per approximately 1 568 ha. Females and Juveniles having an approximate density of one (1) individual per 871 ha.

B. Post hunting leopard numbers and densities

For the purpose of the document, it is concluded that a total number of two (2) male leopards were removed from the population in 2016. This in turn results in a lower density of male leopard for Mokore. This density being approximately 1 000 ha larger per male in post hunting than what it was in pre-hunting conditions. It can however again be mentioned that these available territories will become occupied by other males moving into the area.

Umkondo Leopard

The data collection for Umkondo is done in the same manner as on Mokore. It can also be noted that on Umkondo, no bait sites were place within an area of approximately 1 300 ha in size, namely around the Mokore River west of the main road. This area is adjacent to that of the area that was not baited on Mokore Ranch.

A. Pre-hunting leopard numbers and densities

Umkondo Ranch is approximately 6 736 ha in size. A total number of eleven (11) leopards were identified on six (6) baits throughout Umkondo. A total of number of four (4) males were recorded, five (5) females and two (2) juveniles. A total density of approximately one (1) leopard per 612 ha presented itself on Umkondo. Males had an average density of 1684 ha per individuals. Females and Juveniles had an approximate density of 962 ha per individual.

B. Post hunting numbers and densities

A single (1) individual was removed from the population on Umkondo Ranch for 2016. As a result of this the male density differs approximately 560 ha greater per individual post hunting.

Combined Data

Combined a total of twenty five (25) leopard were identified, with an approximate density of 583 ha per leopard. Males having an approximate density of 2 429 ha per individual and females and juveniles 911 ha per individual. This data is based on the post hunting data. Numbers and densities will change pre-hunting season 2017 depending on whether or not available territories become occupied. A large area of approximately 3 300 ha has also gone un-baited. This will also affect leopard numbers and densities especially when considering females and possibly juveniles.

Discussion

When considering data pertaining to this document it is important to note that some leopards both on Mokore and Umkondo would have been missed due to numerous reasons. Main reasons are areas being devoid of baits and the possibility of males not feeding on baits is not to be ignored. It is hypothesized that the 2017 pre-hunting season will yield higher numbers and densities of leopards, especially males.

A total number of three (3) leopards were removed from the population in 2016, two (2) on Mokore and one (1) on Umkondo.

Table 1: Identification sheet of leopards on Mokore.

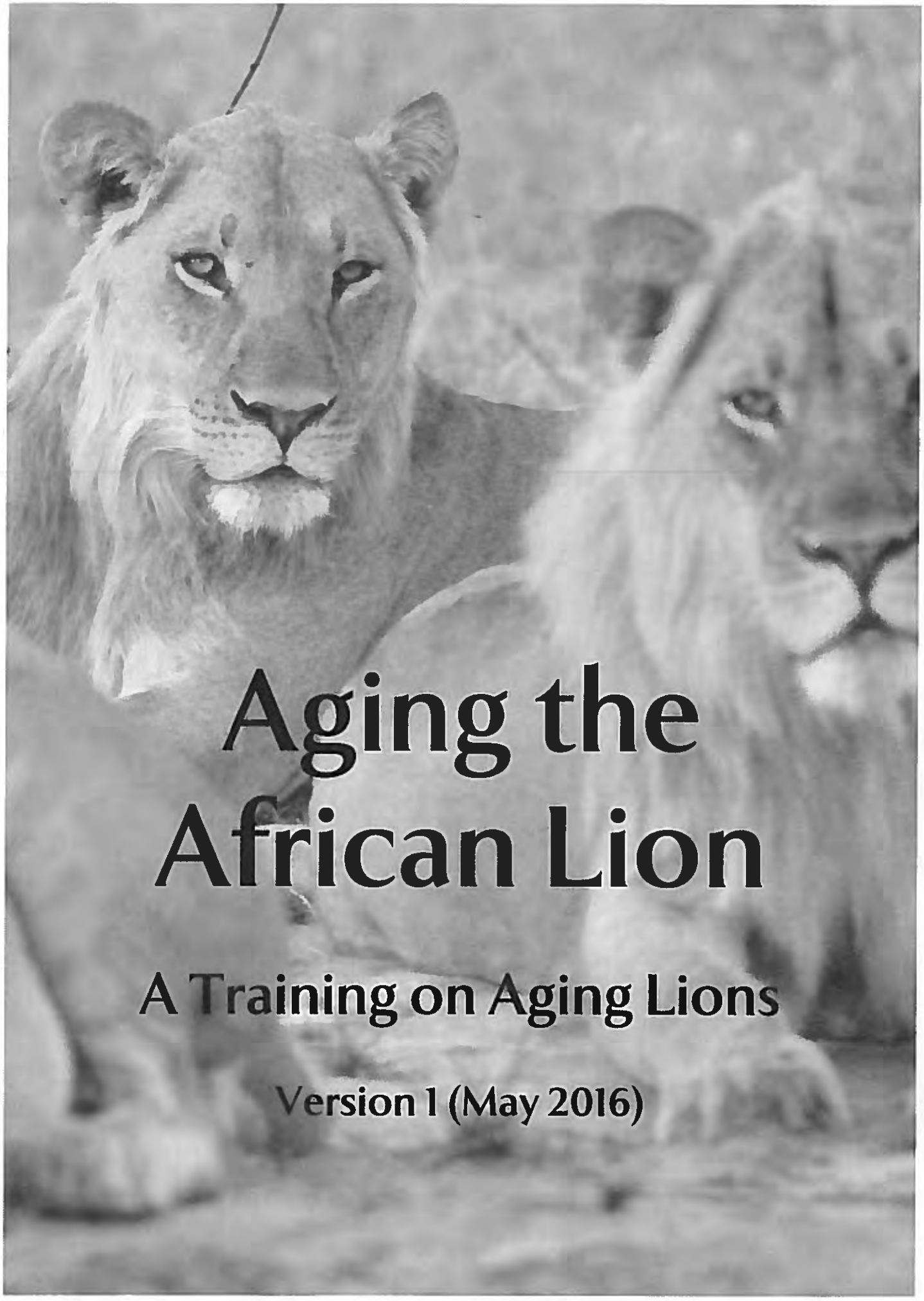
Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
Boma cat	M	3		Boma, Savuli Boundary	398805	7750153
MF001	F			Boma, Savuli Boundary	398805	7750153
JM001	Unknown		MF001	Boma, Savuli Boundary	398805	7750153
The King	M	4		Mdala Pan Bait Site	401161	7744365
Shlabata Cat	M	6		Billys Bait site	405746	7743229
MF002	F			Billys Bait site	405746	7743229
MF003	F			Gwezi Bait Site	406370	7744543
JM002	Unknown		MF003	Gwezi Bait Site	406370	7744543
2 Smile	M	3		Billys Bait site	405746	7743229
MF004	F			Mokore River, Crowned Eagles Nest	406968	7748034
MF005	F			Bow Stream	408794	7743750
Bow Cat	M	4		Bow Stream	408794	7743750
MF006	F			Majewe Weir	402133	7742862
JM003	Unknown		MF006	Majewe Weir	402133	7742862
Muchwa Cat	M	3		Majewe Weir	402133	7742862

*MF	Mokore Female
*JM	Juvenile Mokore
	Male removed from Population

Table 2: Identification sheets of leopards found on Umkondo.

Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
UF001	F			3 spots bait site	408167	7754697
5c	M	4		Umkondo Mine Dam	410765	7752730
Zizi Dip Cat	M	4		Thierrys Bait Site	415070	7755639
UF002	F			Thierrys Bait Site	415070	7755639
JU001	Unkown		UF002	Thierrys Bait Site	415070	7755639
Dick and Balls	M	4		Umkondo/Sango Nothern Boundary	407314	7753919
UF003	F			Umkondo/Sango Nothern Boundary	407314	7753919
UF004	F			Bedford Tanks	410316	7749369
UF005	F			Torchwood Bait Site	416065	7752784
JU002	Unkown		UF005	Torchwood Bait Site	416065	7752784
3 spot	M	5		3 spots bait site	408167	7754697

*UF	Umkondo Female
*JU	Umkondo Juvenile
	Male removed from population



Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Background and Applications

Lions in Africa

As the dominant predator in Africa, the African lion (*Panthera leo*) is highly valued for its ecological role and importance for the tourism industry. However, lions have declined by an estimated 42% over the past 21 years (3 generations) to approximately 20,000 individuals (Bauer et al. 2015). Robust tools for assessing and managing lion population dynamics are critical for survival of the species.

Why Age Lions?

Age is a common metric used throughout the world to guide the management, research and sustainable harvest of many types of wildlife, including large carnivores, ungulates and fish. Knowing an animal's age is critical for accurately estimating key elements of wildlife behavior and life history, such as reproduction, survival, movement and population size. Our ability to successfully conserve and manage wildlife depends on how well we understand each animal's social and biological role, which is closely tied to age.

Implications for Management and Research

Managers use population models based on the age structure of a population to help predict how different management scenarios or environmental stressors might affect the future of a species. Population models project a species' population size based on information about a species' life history, including conception rate, birth rate, survival of young, age at puberty, territoriality and other behavioural characteristics. The age or life stage of an animal is closely tied to its reproduction, survival, behavior, and other aspects of its ecology that can affect population stability. Thus, an animal's age in the context of its population can provide valuable information about the future of a single population and, for threatened species like the African lion, even the species as a whole.

For this reason, age is an important metrics collected by lion researchers. For example, researchers that collar individual lions must be able to accurately age the lions they study in order to understand lion behaviour in a broader context. Ensuring that lions have the natural resources and the protection that they require at different phases of their lives is critical for ensuring their conservation.

Importance for Sustainable Hunting

Lions are the only social big cats in the world. Each pride consists of 4-5 adult lionesses, their dependent cubs, and a temporary coalition of pride males. Pride males play a key role in defending their pride against invading males by forming coalitions of 2-3 males to defend the pride territory through roaring, patrolling, scent marking and aggressively approaching invading males. When new males enter a pride, they often kill cubs (a behavior termed "infanticide") in order to bring lionesses into estrus more quickly so they can produce offspring. Infanticide

Resources

Resources for Learning to Age Lions

The ability to accurately age lions takes time and practice to develop, but is the sign of a dedicated and accomplished expert who understands lion biology. We encourage you to take advantage of the other resources that were developed alongside this training by visiting http://AgingTheAfricanLion.org, including:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

Before You Begin: Test Yourself!

To see your improvement after taking this training, we encourage you to test your lion aging score online at http://AgingTheAfricanLion/TestYourself.org. When you finish the training, test yourself again!

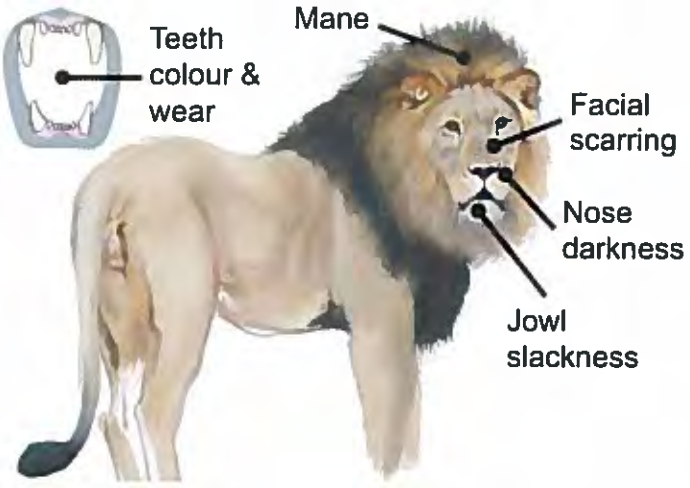
Training

How to Age a Lion

Scientific research on lions across Africa shows that a male lion's appearance changes with five main physical characteristics that can be distinguished into four age classes (Miller et al. 2016):

Aging Characteristics
- Teeth color and wear
- Facial scarring
- Nose darkness
- Mane
- Slack jowl

Age classes
1-2 years
3-4 years
5-6 years
≥7 years



Minor variation in each physical characteristic between lions of the same age means that a single trait should never be used alone to determine age: always reference 3-4 characteristics to reliably narrow down a lion's age. This will ensure the greatest accuracy possible.

Aging Characteristics

1. Teeth Color and Wear

Teeth become more yellow and worn with age.

1-2 years
White, sharp

3-4 years
Light yellow,
sharp or lightly worn

5-6 years
Light yellow,
lightly or heavily worn

≥7 years
Dark yellow, lightly
or heavily worn

2. Facial Scarring

Lions acquire scarring and pocketing on their faces due to fighting.

1-2 years
No scarring

3-4 years
No or light scarring

5-6 years
Light scarring

≥7 years
Heavy scarring

3. Nose Darkness

Lion noses darken from pink to black with age.

1-2 years
Mostly pink
0-30% black

3-4 years
Slightly black
20-60% black

5-6 years
Mostly black
40-70% black

≥7 years
Nearly all black
40-100% black

Next Steps

Photo Galleries & Pocket Guides

After finishing this training, check out the other resources available at http://AgingTheAfricanLion.org:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

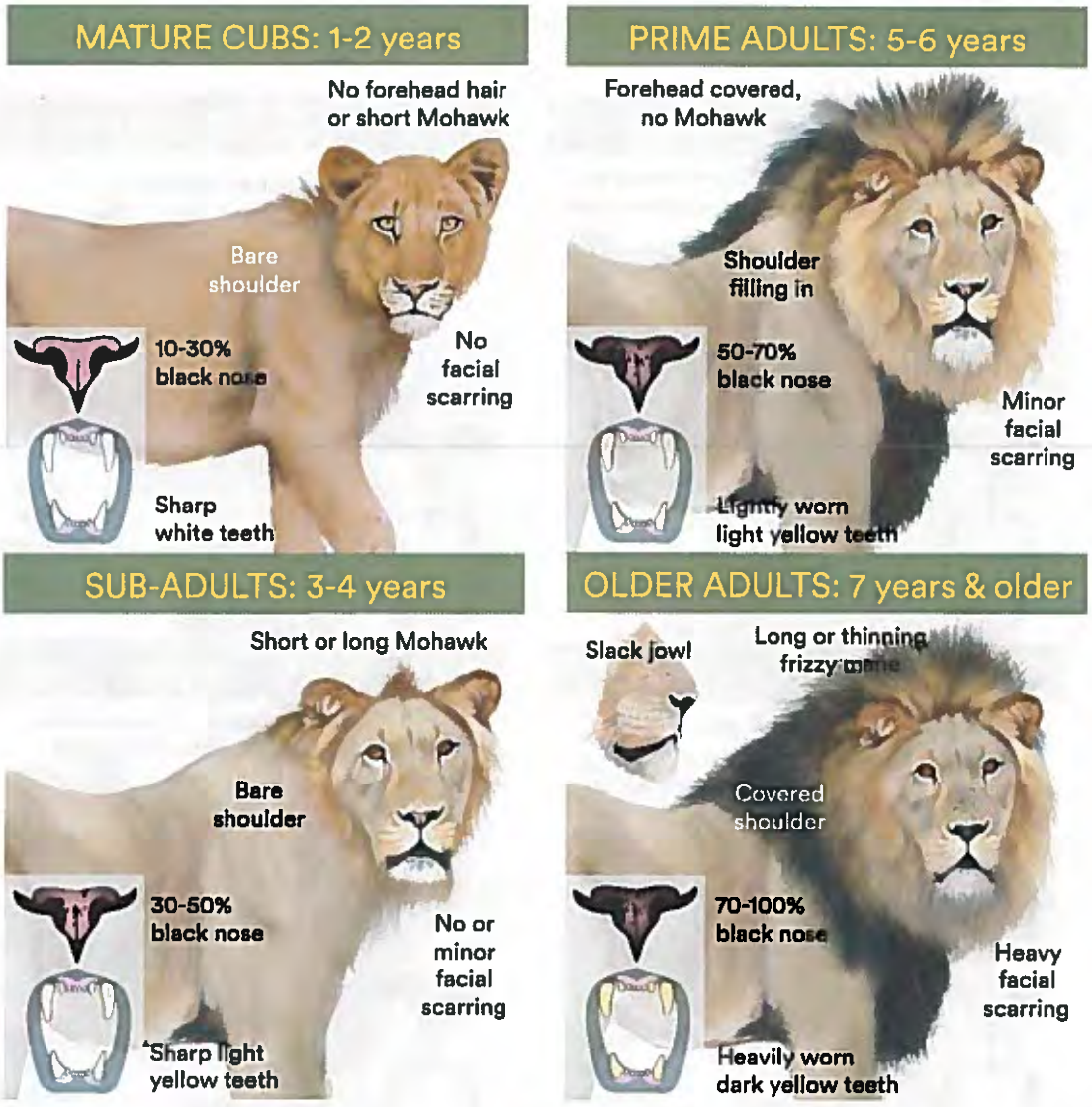
After You Finish: Re-Test Yourself

To see your improvement after reviewing this training and the online photos and pocket guides, re-test your lion aging accuracy online at http://AgingTheAfricanLion/TestYourself.org.

Pocket Guides

Pocket guides to use for quick reference in the field are available on the last pages of this course packet and online at http://AgingTheAfricanLion.org/Resources.html

Quick Guide to Southern and High-Lying Africa
(e.g. Hwange in Zimbabwe, Serengeti in Tanzania)



Available as complete pocket guide at http://AgingTheAfricanLion/Resources.org.

Mokore Safaris PH Rules

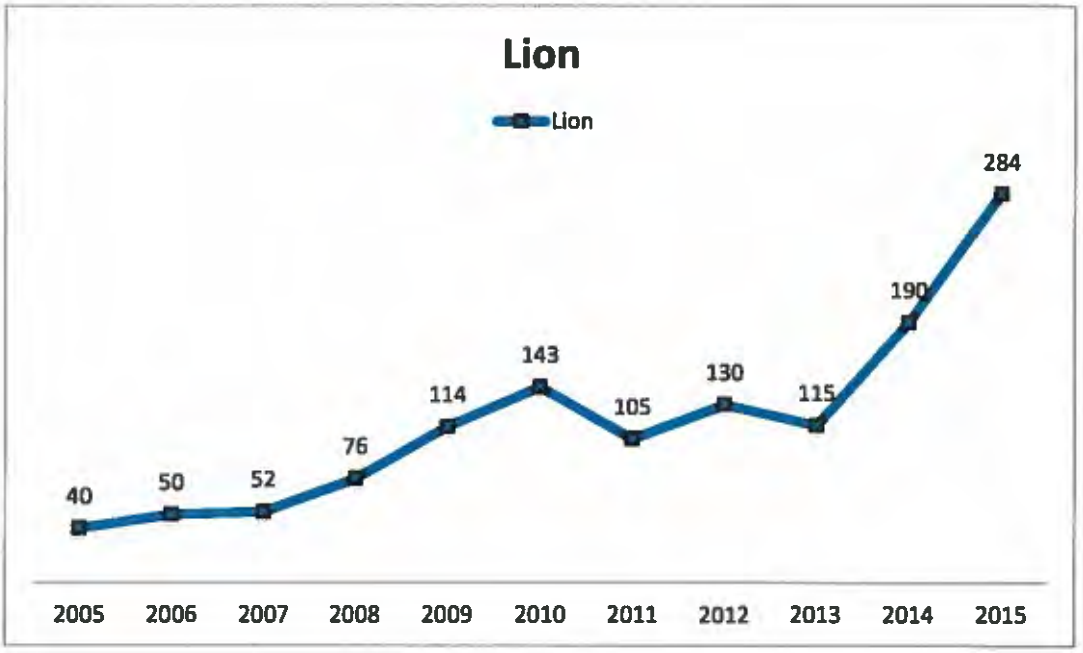
1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save Valley hunts please refuel at Nyika on the way in. For Sengwa Hunts please refuel at Gokwe.
2. Paperwork – Please can all PHs fill in the skinners books complete with all measurements and details. Also those hunting in Sengwa please make sure that the measurements of all trophies is completed on the ZPWMA kill returns supplied in the file.
3. Mokore Safaris is attempting to maintain the quality of our herds for the future and so the following will apply (no excuses tolerated):
   a. Any soft – top buffalo will attract a fine as follows:
      i. Over 43" spread - $1000
      ii. 40 – 43" spread - $500
      iii. 35 – 40" spread - $ 200
      iv. Below 35" – fire at will!

b. Any lion under the age of 5 years - $ 10 000
c. Any sable without at least 2" secondary thickening - $200
d. Any elephant under 40 lbs in the Save - $500

SVC Predators 2015

When considering species such as Lion, Leopard and Spotted Hyena, all which are Trophy hunted within the SVC, it is clear that hunting has aided the conservation of these species (Groom 2012). Population trends below show slight fluctuation and a steady increase of Lion and Leopard within the SVC. *The recent decrease in Spotted Hyena numbers can be contributed to a rapid increase in lion numbers and species competition.* Further details can be seen in *Lion Hunting in Zimbabwe's Savé Valley Conservancy, A Conservation Success Story, Dr Rosemary Groom, African Wildlife Conservation Fund.*

Populations of Lion (*Panthera leo*) , Leopard (*Panthera pardus*) and Spotted Hyena (*Crocuta crocuta*) can be depicted as follows:



ıge 1: Population trends for Lion of the SVC from 2005 to 2015.

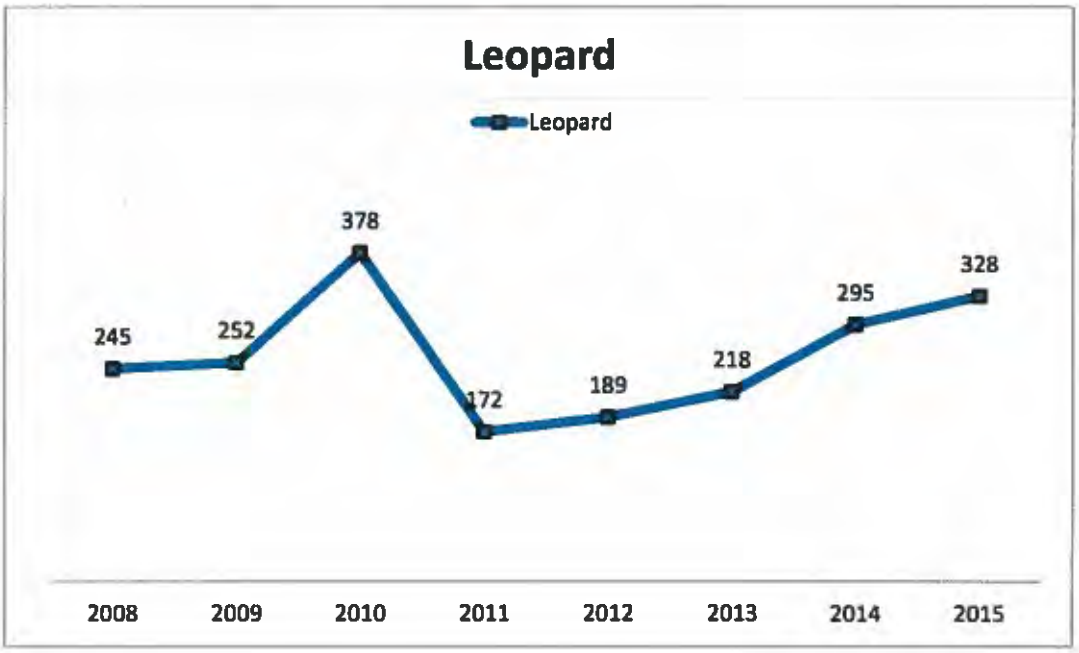


Image 2: Population trends of Leopard for the SVc from 2008 to 2015.

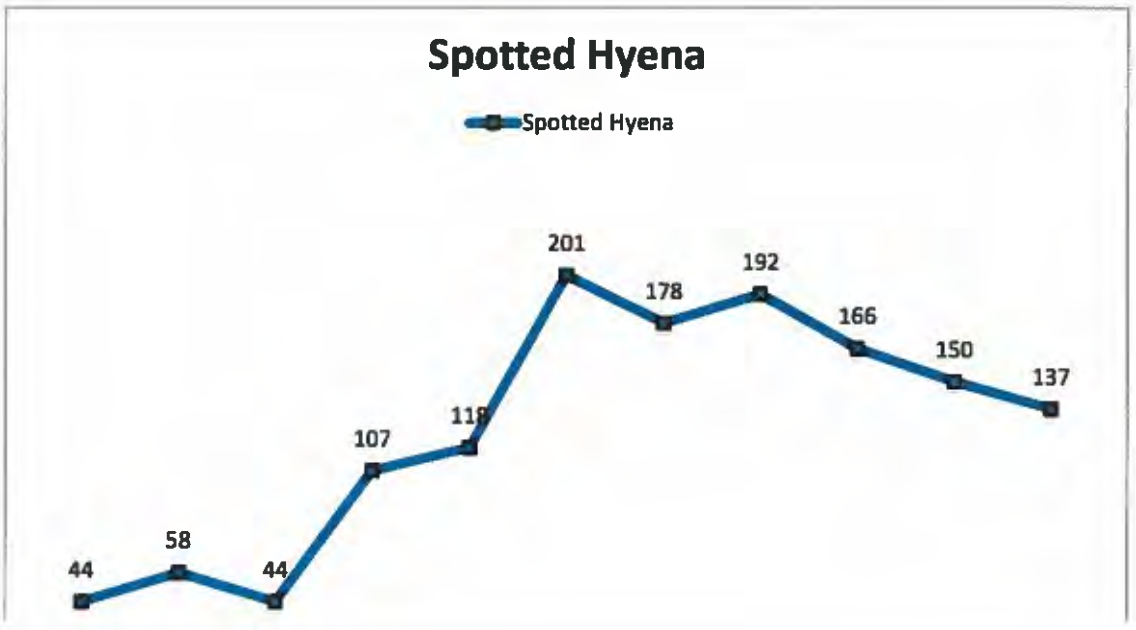


Image 3: Population trends for Spotted Hyena of the SVC from 2005 to 2015.

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

ZIMBABWE

No. of Days	Description of Safari	US$
5 day	Non-trophy Buffalo Package (Below 34" and Non-exportable)	$8,500 Package
5 day	Non-trophy Buffalo Package (Below 34" and Exportable)	$9,500 Package
7 day	Plains game Mokore	1x1 - $550/Day
7 day	Plains game Mokore(2 Clients per 1 Pro-Hunter)	2x1 - 500 each/Day
7 day	Plains game Mokore Bowhunt	1x1 - $500/Day
7 day	Plains game Mokore Bowhunt (2 Clients per 1 Pro-Hunter)	2x1 - $450 each/Day
7 day	Plains game Mokore Bowhunt (3 Clients per Pro-hunter)	3x1 - $400 each/Day
7 day	Plains game Sengwa	1x1 - $750/Day
7 day	Plains game Sengwa (2 Clients per 1 Pro-Hunter)	2x1 - 700 each/Day
7 day	Non-trophy Elephant (Cow, Non-exportable)	$12,000 Package
7 day	Hippo/Crocodile	1x1 - $1,300/Day
10 day	Sable/Plains game	1x1 - $1,000/Day
10 day	Tuskless Elephant/Plains game	1x1 - $1,000/Day
12 day	Tuskless Elephant/Buffalo/Plains game	1x1 - $1,300/Day
10 day	Buffalo/Plains game	1x1 - $1,300/Day
10 day	Buffalo/Plains game (2 clients per Pro-Hunter)	2x1 - $1,250 each/Day
15 day	Leopard/Plains game	1x1 - $1,500/Day
15 day	Buffalo/Sable/Plains game	1x1 - $1,300/Day
15 day	Buffalo/Leopard/Plains game	1x1 - $1,750/Day
18 day	Buffalo/Leopard/Sable/Plains game	1x1 - $1,750/Day
12 day	Elephant/Plains game Mokore	1x1 - $ 1,500/Day
12 day	Elephant/Plains game Sengwa	1x1 - $1,000/Day
15 day	Elephant/Buffalo/Plains game	1x1 - $1,500/Day
21 day	Lion/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - $2,500/Day
28 day	Lion/Elephant/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - $2,500/Day

Observer Fees - US$250 per person per day

CITES permits for elephant, leopard and crocodile: $150 each

Pre-baiting for cat or crocodile hunts: $300 per day + bait trophy fees

Vehicle Transfers - $500 one way/vehicle

Conservation Levy - $20/person/day

4% Gov levy on total daily rates and trophy fees

All Cat or Elephant hunts on Private Land now need a Parks Ranger - $100/day that he is needed

TROPHY FEES

	US$		US$
Elephant Bull - Mokore	15,000.00	Zebra Bait (Mokore only)	500.00
Lion	15,000.00	Bushpig	500.00
Elephant Bull - Sengwa	12,500.00	Warthog	500.00
Leopard	7,500.00	Caracal	500.00
Sable	5,000.00	Antbear	450.00
Hippo	5,000.00	Honey Badger	450.00
Buffalo	5,000.00	Grysbok	375.00
Crocodile	4,500.00	Serval	350.00
Tuskless Elephant	4,000.00	Civet	300.00
Nyala	4,000.00	Duiker	290.00
***Waterbuck	2,400.00	Jackal	275.00
Buffalo Cow	2,000.00	Impala males	250.00
Eland	1,950.00	Genet	225.00

ANOTHER FINE EXAMPLE OF CONSERVATION THROUGH SUSTAINABLE AND ETHICAL HUNTING.

Prior to 2002, Coutada 9, like all other wilderness areas in Mozambique, had been through over 25 years of civil war and rampant poaching. This massive area (4333 square kilometres) was left virtually devoid of wildlife. Furthermore, the area suffered serious habitat destruction, being subjected to annual late season bushfires and the indiscriminate cutting of trees through "slash and burn" agricultural practices. In 2002, Rio Save Safaris, took over the concession and set out to re-habilitate the area to its former glory. Firstly, they needed to take control of the massive poaching epidemic and provide surface water for the very limited remaining wildlife.

Over the past 13 years RSS has drilled 22 boreholes and constructed 12 large dams, these provide permanent surface water for the wildlife in Coutada 9. This water is essential for life and all species benefit, including birds, smaller mammals as well as insects. The construction of these dams has been a lengthy and expensive exercise.

Some of the completed dams on Coutada 9 creating permanent surface water for the wildlife.

Since 2003 RSS anti-poaching teams have consistently removed over 1000 gin traps per year, caught on average 150 poacher per year and confiscated numerous homemade muzzle loader rifles as well as a few modern assault weapons like AK 47's from poachers. For EVERY weapon confiscated, poacher apprehended or trap removed RSS have paid an incentive bonus to the anti-poaching units. Due to these continuous efforts, the wildlife has thrived and flourished, to the stage where most populations have reached sustainable population densities.

A year's haul of traps and guns with some of RSS anti-poaching game scouts.

An elephant bull poisoned by villagers where nothing from the animal was utilised and one of the 150 poachers arrested annually by RSS anti-poaching units with his traps. Most poaching is done for commercial use and totally unsustainable.

Some species populations, however were so low that RSS set out to re-introduce these species. Not a small feat in itself considering no importation of wildlife or inter-area game transfers had ever taken place in Mozambique.

After 18 months of tireless negotiations, RSS imported 10 lions in September 2009 from Phinda Game Reserve in South Africa. They were transported and successfully released them into Coutada 9 over 1600 km away. They have settled and are breeding well in the coutada.

Waterbuck numbers, a species that once thrived in Coutada 9, were down to a mere handful after the civil war. RSS made a deal with Gorongosa National Park to swop 20 Zebra and 40 eland for 146 waterbuck. GNP got to increase their eland and zebra populations and C9 received 146 waterbuck in September 2013. Waterbuck are now seen daily and breeding well.

Eland from Coutada 9 being released into Gorongosa National Park and the replacement Waterbuck into C9.

Waterbuck and eland successfully released .

A key priority from the outset, was to boost the local remnant buffalo population and after more than 10 years of trying to source buffalo from surrounding countries as well as within Mozambique. RSS was FINALLY granted permission from the Mozambique government to capture 50 buffalo as a trial from the Zambesi Delta reserve. This was finally achieved in 2015. The 50 buffalo are safe and sound in Coutada 9 with plans now to capture a further 250 next year.

The first 50 buffalo in their quarantine bomas, November 2015.

These projects and all other developments such as building of road networks, Safari Camps and staff accommodation to date have been funded through trophy hunting. RSS operates on a strict sustainable offtake quota where a small percentage, normally 2-5% of a population, is harvested. These animals are usually males past their prime and their removal has little impact on the overall species population.

All funds raised through trophy hunting to date, have gone back into the conservation and development of this magnificent area as well as to support the local communities. Unfortunately due to the remoteness of the concession and thick bush, photographic tourism is very limited and not a feasible option for this area.

RSS employ 50 game scouts for anti-poaching alone as well as another 60 plus people for all other development work required. This in turn provides over 100 families with a reliable source of income and food annually.

Of the animals harvested 25 % of the trophy fee received from foreign hunters goes directly to the local communities. RSS also supplies most meat to the community either directly through delivering it to the local villages or indirectly through issuing it to the staff working within the Coutada. The meat from ALL animals harvested is FULLY utilised, including lions, baboons and especially elephant.

RSS has also built a school, clinic and drilled boreholes for the surrounding communities. Many of our hunting clients have made donations to the school personally or in the form of delivering SCI Blue Bags.

Poaching, as opposed to legal trophy hunting, is indiscriminate, without regard to age, sex or species of animals killed. There is no respect for boundaries or numbers of animals harvested and if not constantly policed there WILL be no wildlife left. The general modus operandi of the poachers in this region is hunting with homemade gin traps or snares which is very cruel. When RSS initially arrived in Coutada 9 almost every animal harvested by hunters was missing a foot from these traps.

Basically, the animal once trapped will drag the trap around for 3 -4 days until the poachers catch up to it and kill it with an axe or spear. Some species such as lion, buffalo, leopard and elephant that they cannot kill due to the danger aspect with their axes are left to drag these traps around for weeks until the animal dies either from starvation or from infection. Sometimes the animal's foot rots, breaks or is bitten off. These survivors are then crippled for life, or slowly lose condition and die.

One male lion had three of its four limbs injured from traps. Thanks to hunter supported anti-poaching efforts there are far fewer cases of injured animals but still a massive and continual problem.

An eland with a trap on that escaped the poachers with two axes embedded in it and a baby elephant that had to be put down after dragging this trap for over a week.

A buffalo cow that was caught in a trap that was put down after a week and one of several elephant poached annually for their ivory.

A mature lioness and a sub adult lioness that both died from these traps.

A young male lion that was caught with a trap, after a week it's foot rotted off and is now walking around with only 3 feet.

The illegal cutting of hardwoods for planking is another massive problem and the RSS anti-poaching team is heavily involved in trying to protect all the beautiful hardwoods on Coutada 9.

The only donations received to date have been from the hunting organisations, Dallas Safari Club and Safari Club International. RSS would like to thank them both for helping us save the animals and habitat on Coutada 9.

A massive THANK YOU to all the hunters who in following their passion for adventure in wild Africa. Have saved thousands of animals in Coutada 9, provided employment and income for many families as well as fed thousands of local villagers over the past 13 years. None of the animals pictured here have names but hunters are the ONLY ones fighting to save these remote and wonderful areas and their wildlife. Your continued support of sustainable hunting is greatly appreciated.

Pictured above is 1306 gin traps, 68 cable snares, 9 can rat traps and 25 homemade muzzle loaders that were collected by our RSS anti-poaching team in 2015 alone. This anti-poaching effort alone costs RSS over US$100 000 annually, all of this comes from sustainable hunting.

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

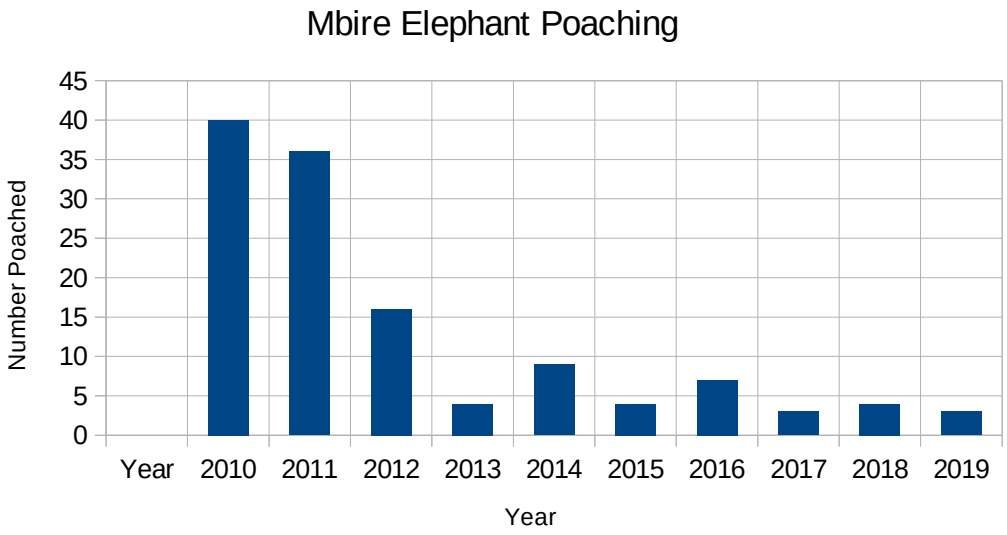

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

From: King, Jenna D
To: cf@conservationforce.org
Cc: Brisendine, Amy
Subject: FWS Permit Application #78392C
Date: Monday, August 17, 2020 9:28:23 AM

Hello,

This email is in regard to the FWS permit application #78392C for Eric Jahde to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between October 1, 2018 and October 21, 2018. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: Aimee Korver
To: John J. Jackson, III; King, Jenna D; John Jackson, III; emjahde@emjahde.com
Subject: [EXTERNAL] Re: Fwd: FWS Permit Applications #78386C, 78392C, and 75286C
Date: Friday, August 21, 2020 11:40:09 AM

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. King,

I just got the confirmation from Mr. Jahde that he did NOT get a lion on that trip- and he would like to withdraw his application.

Let me know if you have any other questions.

Kindest Regards,

Aimee Korver

On August 21, 2020 at 10:23 AM Aimee Korver <permits@conservationforce.org <mailto:permits@conservationforce.org> > wrote:

Ms. King,

Attached you will find the hunting permits for Mr. Riggs Prt # 75286C.

He took the lion on June 20th, 2018.

I am still getting confirmation on Mr. Jahde's import permit application - he did not take a lion, but I need to confirm with him if he wants to withdraw his applicaiton.

Mr Campagna - I will have the information later today to submit- he will be forwarding me his hunting permits with the confirmed date of hunt- which I will forward to you.

Thank you for following up with me regarding the inquiries. I truly appreciate it.
Let me know if you have any other questions.

Kindest Regards,
AiméeKorver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233

email: permits@conservationforce.org <mailto:permits@conservationforce.org>
www.conservationforce.org

rg>

Hello,

I realize that I have sent you quite a few information requests recently, and I am still awaiting a response on the following three applicants. I wanted to reach out again in case the emails I sent prior got buried.

78386C, Jeffrey Campagna, hunted in June/July 2018, need specific date of hunt

78392C, Eric Jahde, hunted in October 2018, need specific date of hunt

75286C, Keith Riggs, hunted in June 2018, need specific date of hunt

Thank you and let me know if you have any questions.

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike,MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.or <g" rel="noopener" target="_blank" data-mce-href="https://www.cites.org/eng/disc/how.php>g">https://www.cites.org/eng/disc/how.php>g <https://www.cites.org/eng/disc/how.php>

RCVD FEB 27 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Morris	Brandon	Trey	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Shreveport	LA	71101	Caddo	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17453298BC/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicab… information submitted in this application for a permit is complete and accurate to the best of m… may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signatur… pied or stamped signatures) Date of signature (mm/dd/yyyy) 02/15/2018

…e to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera Leo Lion

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe Property name: Senuko 2 Hunting company: Senuka Ranching LTD
      GPS S 20 38 386 E 032 38 386

   b. Date wildlife is to be hunted:

      May 25th to June 14th of 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks). Skin, Skull, claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      N/A

   b. Date wildlife was hunted:

      N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Rd
Address:
City: Belmont
State/Province: Bulawayo
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 2-15-18

Be aware that there may be [redacted] val requirements by your local or state government, as well as required by other F[redacted]rnment to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Houston, TX

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as page 1

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Darbi Rice (b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Barry, Anna <anna_barry@fws.gov>

Trey Morris PRT #78547C

1 message

Barry, Anna <anna_barry@fws.gov> Mon, Jul 23, 2018 at 2:43 PM
To: Darbi Rice <drice@shreveportlaw.net>
Bcc: Monica Makins <monica_makins@fws.gov>

Dear Darbi,

Since it is additional information for his current application, the information could had been sent to me by e-mail, a new application was not needed. I will ensure the information is include in his current file.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. **We do not accept applications via fax or e-mail.***

***Sign up** for our e-newsletter to learn how we're working around the globe to protect species and their habitats!*

On Mon, Jul 23, 2018 at 12:46 PM, Darbi Rice <drice@shreveportlaw.net> wrote:

> I mailed an updated permit application regarding Mr. Morris. He was able to take the lion while in Africa. I filled out the form and attached the necessary documentation for already having taken the trophy.
>
> Just wanted to give you a heads up. Not sure who will be assigned to the new application. Thank you.
>
> **Darbi Rice**
>
> **Office Manager**
>
> **Morris, Dewett & Savoie, LLC** | 509 Milam Street | Shreveport, Louisiana 71101
>
> (d): 318.221.1507 | (f): 318.221.4560

drice@shreveportlaw.net | Firm Website

CONFIDENTIALITY NOTICE

The information contained in this e-mail transmission, including all documents accompanying it, is legally privileged and confidential, intended only for the use of the individual or entity named above. If you have received this transmission in error, please contact us immediately at (318) 221-1507.

Barry, Anna <anna_barry@fws.gov>

Permit #78547C Trey Morris

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Sep 18, 2018 at 9:45 AM
To: Darbi Rice <drice@shreveportlaw.net>

Based on your e-mail message below the application has been withdrawn.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Sep 14, 2018 at 5:22 PM, Darbi Rice <drice@shreveportlaw.net> wrote:

> Permit number 78547C is a duplicate and needs to be withdrawn.
>
> Please let me know if you need anything else.
>
> **Works on Rice**
>
> **Office Manager**
>
> **Morris, Dewett & Savoie, LLC** | 509 Milam Street | Shreveport, Louisiana 71101
>
> (d): 318.221.1507 | (f): 318.221.4560

drice@shreveportlaw.net | Firm Website

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Barry, Anna <anna_barry@fws.gov>

Permit #78547C Trey Morris

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Sep 18, 2018 at 9:45 AM
To: Darbi Rice <drice@shreveportlaw.net>

Based on your e-mail message below the application has been withdrawn.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Sep 14, 2018 at 5:22 PM, Darbi Rice <drice@shreveportlaw.net> wrote:

> Permit number 78547C is a duplicate and needs to be withdrawn.
>
> Please let me know if you need anything else.
>
> **Works on Rice**
>
> **Office Manager**
>
> **Morris, Dewett & Savoie, LLC** | 509 Milam Street | Shreveport, Louisiana 71101
>
> (d): 318.221.1507 | (f): 318.221.4560

drice@shreveportlaw.net | Firm Website

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CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
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March 4, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 15 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find three applications to import sport-hunted lion trophies. The first applicant is hunting in South Africa, at Khamab Kalahari Game Reserve, an area that has been designated to have "wild" lion by South Africa's Department of Environmental Affairs. Please refer to the attached list and information in the DMA's files, which includes the management plan for this reserve. The applicant is lawfully hunting a lioness as a population control measure, as explained in the attached justification. Please consider that information and the information previously submitted by South Africa's DEA and Conservation Force in making a positive enhancement finding for this applicant.

The second applicant is hunting in Tanzania with Rungwa Safaris/Bundu Safaris. This operator has submitted an enhancement report, which was sent to the DMA in October 2016 and is attached for ease of reference. Please consider that information and the information previously submitted by Tanzania's Ministry of Natural Resources and Tourism/Wildlife Division/Tanzania Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

The third applicant is hunting in Zimbabwe in the Dande South concession. This concession incorporates extensive anti-poaching and community investment. We will shortly submit an enhancement report from this operator. Please consider that information and the information previously submitted by Zimbabwe's Parks and Wildlife Management Authority, Conservation Force, and others in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: (b)(6)

Name: John Stephen Wright

Date: 2/15/18

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

MAR 15 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Wright	John	Stephen	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)		(b) (6)	

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Amarillo	TX	79109	Randall	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: un known No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other [illegible] formation submitted in this application for a permit is complete and accurate to the [illegible] subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

2/18/18
[illegible] or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo melanochaita

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Tanzania, likely Rungwa Mpera

   b. Date wildlife is to be hunted:

      August 2019

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      Skin, skull, claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Rungwa Game Safaris/Tanzania Bundu Safaris
Business Name:	1-Sable Village
Address:	Kisongo,Arusha
Address:	Tanzania
City:	
State/Province:	
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if [redacted], once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] Date: 2/18/18

Be aware that there [redacted] nts by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import applications / request for information

2 messages

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:08 PM
To: jjj@conservationforce.org, cf@conservationforce.org
Cc: Mary Cogliano <mary_cogliano@fws.gov>

Mr. Jackson,

We are in the process of reviewing applications for the import of African lions taken from Tanzania. A number of applicants have named you as the representative for all matters concerning the application. I have attached a list of the applications currently pending for which you have been named as the representative.

As you are aware, the U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. As you know, we are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings. As such, we would like to give you the opportunity to submit additional information in support of these application requests. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

TZlionApplications-RepJJackson.xlsx
16K

Butzler, Julia <julia_butzler@fws.gov> Wed, Jul 25, 2018 at 10:22 AM
To: jjj@conservationforce.org, cf@conservationforce.org, (b) (6)

Mr. Jackson,

Please use the updated spreadsheet for reference of the applications that name you as their representative.

Thank you,
[Quoted text hidden]

TZlionApplications-RepJJackson.xlsx
17K

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Trophy Permit Application #82925C

1 message

Harcum, Heather <heather_harcum@fws.gov> Tue, Sep 10, 2019 at 10:45 AM
To: jjj@conservationforce.org
Cc: cf@conservationforce.org, steve@ascoeq.com

Good morning John Jackson,

I am reaching out in regards to Mr. John S. Wright's application to import an African lion trophy (*Panthera leo melanochaita*) with Rungwa Safaris/Tanzania Bundu Safaris from Rungwa Mperea, Tanzania. This application was received on March 15, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. Could you please respond to the following:

1. Confirm the physical address for Mr. Wright (currently we have 3201 S. Travis St. Amarillo, TX 79109). Is the mailing address the same?

2. Confirm the hunt actually occurred, as we received this application prior to the date of the hunt. If so, what were the confirmed dates of the hunt?

3. Was the lion in question taken? If so, on what date and on which hunting block (location) was the lion taken?

4. What is the name of the hunter he worked with?

Thank you and please feel free to reach out if you have any questions or concerns.

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Harcum, Heather <heather_harcum@fws.gov>

Operator Enhancement Report, 2016 to current

1 message

Harcum, Heather <heather_harcum@fws.gov> Thu, Sep 12, 2019 at 7:36 AM
To: info@rungwasafaris.com

Good afternoon,

I am a representative of the United States Fish and Wildlife Service (USFWS), reviewing an import permit application for a lion trophy hunted in Tanzania through Rungwa Game Safaris/Tanzania Bundu Safaris.

We would like receive the most updated information about the operators the importers hunted with. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings.

We currently have your (quite commendable) operator enhancement report from 2013-2015, but would like the most updated information pertaining to allocation of funds, population status, among other additional information about your concession.

Warmly,
--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

THE UNITED REPUBLIC OF TANZANIA
MINISTRY OF NATURAL RESOURCES AND TOURISM

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Email: dw@mnrt.go.tz
ps@mnrt.go.tz

Mpingo House,
40 Julius Nyerere Road
P.O Box 9372
15472 **DAR ES SALAAM**

Date: 13th August 2015

In reply please quote:
Ref. No. CHA.79/519/01/127

Managing Director
Rungwa Game Safaris (T) Ltd
P.O.BOX 2353
Arusha

Re: HUNTING TERM (2013-2018) PERFOMANCE EVALUATION

The heading above refers.

My Ministry has recently conducted a two years performance analysis for all trophy hunting companies which were allocated hunting blocks for the 2013-2018 hunting term. The analysis involved evaluating utilization of the allocated quota, payment of government dues and compliance with rules and regulations pertaining to trophy hunting.

I wish to inform you that your company showed an outstanding and commendable performance with regards to the underlined criteria.

In light of the above, I would like to congratulate you for performing well and I urge you to keep this spirit up for the remaining part of the 2013-2018 hunting term. Maintaining this performance will automatically qualify your company for renewal of the tenure of ownership of your current hunting block(s) for the 2018-2022 hunting term.

Yours sincerely,

Lazaro Nyalandu

Lazaro S. Nyalandu (MP)
MINISTER

TANZANIA WILDLIFE MANAGEMENT AUTHORITY

OFFICE OF THE CONSERVATION COMMISSIONER

Kingolwira Area, Dar es Salaam Road, TAFORI Building, P.O Box 2658, Morogoro -Tanzania

Ref No: **DA: 517/531/41/22** Date: **14th May,2019**

Managing Director,
Rungwa Game Safaris (T) Ltd,
P.O.Box 13946,
ARUSHA.

RE: 2018 SEASON ANT-POACHING, BLOCK DEVELOPMENT AND COMMUNITY CONTRIBUTION FOT THE BLOCKS RUNGWA – MPERA GR, SELOUS GR K1

We acknowledge receipt of your letter **Ref. RGS/CD/01/19** dated on **04th April, 2019** regarding to the heading above.

The Authority would like to commend and officially appreciate the commitment to support ant- poaching activities, Block and Community development to **Rungwa Mpera GR, Selous GR K1** hunting blocks for year 2018.

In light of the above, you are reminded to pay all outstanding bills if any before commencement of next hunting season 2019.

We thank you for continued cooperation.

Mary R. Kashangaki,
For: **CONSERVATION COMMISSIONER**

UNITED REPUBLIC OF TANZANIA

TANZANIA WILDLIFE MANAGEMENT AUTHORITY (TAWA)

MINISTRY OF NATURAL RESOURCES AND TOURISM

Wildlife Division

TANZANIA WILDLIFE RESEARCH INSTITUTE (TAWIRI)

Non-detriment findings on African lion (*Panthera leo*) in the United Republic of Tanzania, including Enhancement findings

June 2016

Updated June 2017

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APPENDIX 1 Assessment of the Enhancement and Non-Detriment Findings against the IUCN SSC "Guiding principles on trophy hunting as a tool for creating conservation incentives. Ver. 1.0. IUCN SSC (2012)" 65

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ANNEX 1 Letter of the Wildlife Division to IUCN
ANNEX 2 Tourist Hunting Regulations 2015
ANNEX 3 Action Plan for the African Lion and Leopard
ANNEX 4 Dangerous Animals Damage Consolation Regulations 2011
ANNEX 5 AAC 5 years Strategic Plan
ANNEX 6 WMA Implementation Strategy
ANNEX 7 Letter of the Director of Wildlife on Lion quota reduction, 2016

NOTE:

This Document has been prepared by the Wildlife Division of the Ministry of Natural Resources and Tourism and by the Tanzania Wildlife Research Institute (TAWIRI) and was concluded in June 2016.

On 1st July 2016 the Tanzania Wildlife Management Authority (TAWA) became operational. This authority is established under the Wildlife Conservation Act no. 5 of 2009, with the Order of the establishment of the Authority which was promulgated in GN. 135 and published in the Gazette of May 9th 2014.

In June 2017, Section 6.3.5 (Age of the harvested lions) has been added to include the analysis on the age of harvested lions and section 7.1 (Harvest levels) has been updated in order to reflect the analysis of the lion harvest.

1. Introduction

The Government and citizens of Tanzania are aware of dependency on natural resources for its livelihoods and socio-economic development. In recent years Tanzania has achieved high overall economic growth due in part to expanding mining and tourism industries, the latter being largely based on terrestrial wildlife, coastal and marine attractions. Government believes tourism, both consumptive and non-consumptive, holds great potential for the socioeconomic development of the country including rural communities through, for example the operations of Wildlife Management Areas in which private companies can invest.

Sustainable management of natural resources is high on the national development agenda.

In this regard, lion has an important role not only as an apex terrestrial carnivore in the Tanzanian ecosystems, but also as a potential provider of economic benefits through its sustainable use both consumptive and non-consumptive.

Lions fill an essential niche in numerous large African predator-prey relationships. The species also ranks very highly amongst preferred animals for tourists. At the same time lions are also important trophy animals in areas where tourist hunting safari operations are conducted.

Apart from the lion's ecological role in the ecosystem, the lion is also an important economic species which brings in a substantial amount of money to the tourist industry. This includes the tourist hunting safari sector.

Tanzania holds the most important lion population in Africa and on Earth and bear this responsibility with improved strategies to maintain this and other species to levels that are not detrimental to their survival; these strategies encompass a variety of conservation issues, such as Community-Based Conservation, Anti-Poaching, Protected Areas and Wildlife Management in general.

Importantly, to give a new impetus to conservation strategic activities, the Government of Tanzania has decided in 2014 to establish the Tanzania Wildlife Authority (TAWA) in order to improve efficiency and effectiveness in managing wildlife resources and their habitats. TAWA is an autonomous body responsible for undertaking conservation of wildlife resources and biodiversity outside National Parks and Ngorongoro Conservation Area. TAWA was officially inaugurated in October 2015 and at the time of writing this NDF (June 2016) the transition of management activities from the Wildlife Division (WD) to TAWA is taking place. Most of TAWA's funding will come directly from user fees such as hunting license fees, hunting block fees, game fees and daily conservation fees. The viability of TAWA will depend on sufficient revenue from safari hunting.

Sustainable utilization, in the form of highly selective and well-monitored safari hunting, can provide the needed revenues to achieve the goals of these strategies. The proceeds from lion safari hunting[1] are re-invested into conservation and sustainable development in local communities. In this way, sustainable sport-hunting of lions provides direct benefits to both conservation of Tanzania's wild lion populations and the people living with the lions in their areas thereby promoting conservation ethics at the national and local level.

[1] In this document the term Safari Hunting or Tourist Hunting is used and preferred over the tem "Trophy Hunting", as the ultimate goal of this hunting is not the pursue for the bigger "trophy", but rather a touristic, recreational and conservation activity.

2. The distribution of African lion (*Panthera leo*) in Tanzania

2.1 Distribution

In Tanzania, wildlife conservation is at first hand a matter of land use. The lion range and habitat fall within the wildlife protected areas, covering about 40% of the country's land area. Wildlife protected areas is the single largest form of land use in Tanzania. Tanzania has different categories of protected areas that are administered by different authorities. They include 16 National Parks, 28 Game Reserves, the Ngorongoro Conservation Area, 44 Game Controlled Areas, 38 Wildlife Management Areas, and 570 Forest Reserves. New categories of protected areas include Ramsar Sites and Nature Reserves. Commitment to gazette more areas, which are critical habitats for wildlife species, is contained in Tanzania's Wildlife Policy (URT 2007) and the Wildlife Conservation Act No.5, 2009.

Protected areas gazetted as hunting areas (304,400 km^2) are ca. 5 times larger than protected areas without safari hunting activity (57,838 km^2) (Figure 1). The Total of Protected areas is more than 360,000 km^2. Protected areas gazetted as hunting areas cover about one third of Tanzania and serve as prime reservoirs of global biodiversity, securing maintenance of natural ecosystems and prey base for lions.

Therefore, the figures reported on page 80017 of Final Rule are not correct i.e. "*For example, in Tanzania, 25–33 percent of the total area, covering over 247,000 km^2 and encompassing 190 hunting units, has been set aside for sport hunting purposes; this has resulted in an area 5.1 times greater than Tanzania's fully protected and gazetted parks (Jackson 2013, p. 6; Barnett and Patterson 2005, p. 61)."* The total area set aside for sport hunting covers 304,400 km^2 and not 247,000 km^2. Also the statement, in the same page, that these hunting areas are not ameliorating the threat of habitat loss, is incorrect as explained below. Habitat loss is not considered a threat to lion in Tanzania, although the issue of human encroachment on protected areas is being addressed including with the support of hunting operators.

The latest comprehensive global assessment of the lion range in Tanzania covered an area of 816,790 km2, i.e. 92.4% of the terrestrial land in Tanzania (Mésochina et al. 2010). This assessment showed a permanent presence range for lion of 516,900 km^2, i.e. 69% of the documented lion range, and a temporary presence range of 232,800 km^2, i.e. 31% of the documented lion range (Figure 2, more details provided in Mésochina et al. 2010). A more updated range assessment exercise which led to similar results can be found in Hamunyela et al 2013.

There are four main subpopulations of lions in the country:

a) Maasailand Ecosystem, mostly in Mara, Arusha, Kilimanjaro and Manyara Regions (north-eastern of Tanzania);

b) Kagera and Kigoma Regions (north-western of Tanzania);

c) Rukwa, Tabora and Mbeya Regions (central and western Tanzania);

d) Selous Ecosystem, mostly in Lindi, Morogoro and Ruvuma Regions (southern Tanzania).

Figure 1: Network of Protected Areas in Tanzania (Source: TAWIRI)

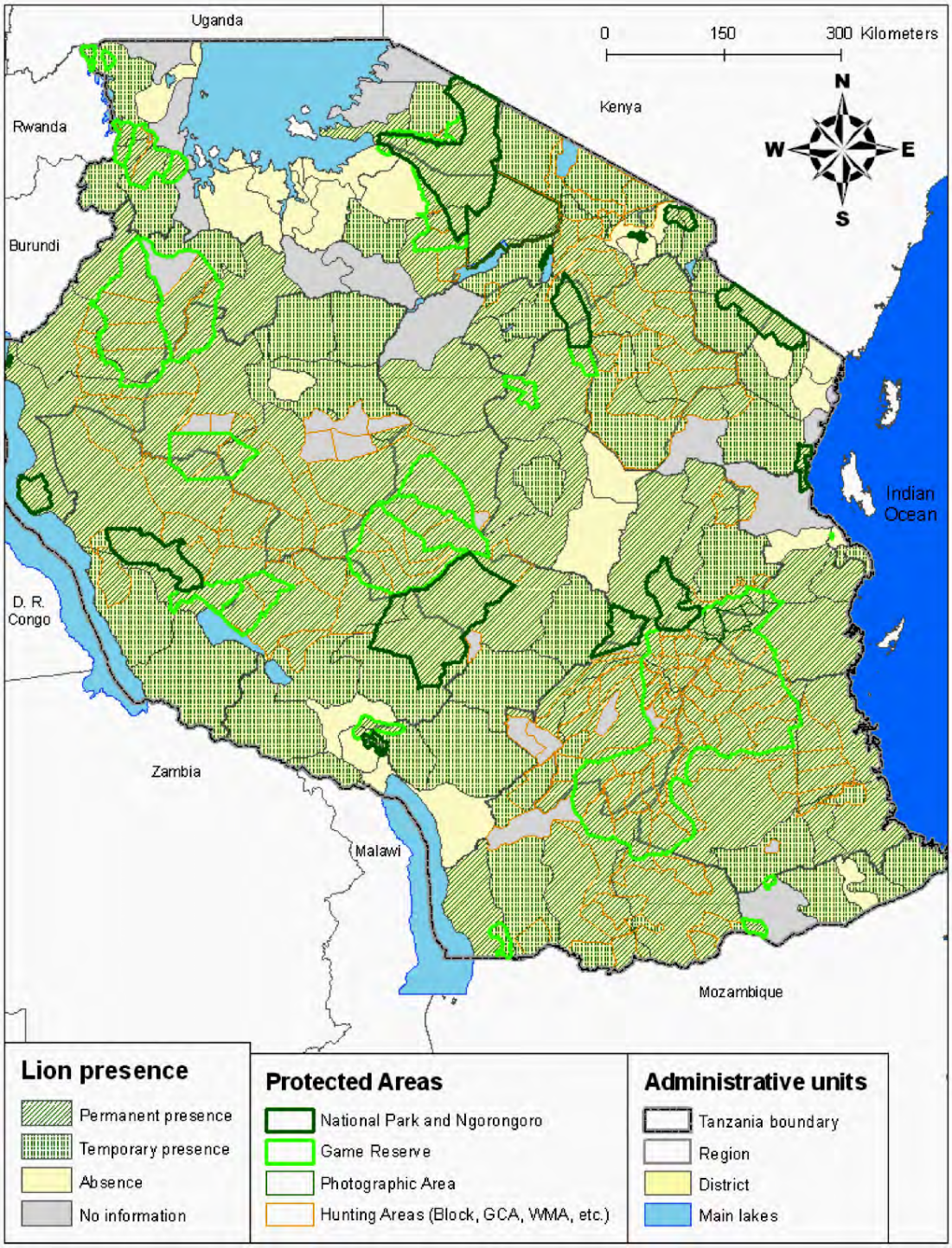


Figure 2: Lion range in Tanzania (by January 2010) for the period 2005-2010. (from Mésochina et al 2010)

3. Population status, census methodologies and recent surveys.

The latest nationwide lion estimates were provided by Ikanda and Packer (2006), and Mésochina et al. (2010). Ikanda and Packer (2006) proposed an estimate of lion abundance of 17,564 [12,208 - 19,320], and Mésochina et al. (2010) and estimate of 16,800.

In the 2010 Mésochina study (2010), a georeferenced database has been set up to collect and analyze the information available (250 bibliographic references) as well as the information generated by specific inquiries (among 321 informants).

According to this assessment, the estimated lion population size of these main subpopulations in 2010 was:

3,700 in the Maasailand Ecosystem;

520 in Kagera and Kigoma Regions;

2,300 in Rukwa, Tabora and Mbeya Regions;

7,200 in the Selous Ecosystem.

Table 1 presents the list of lion census surveys carried out in Tanzania between 2005 and 2015.

In 2014, the Wildlife Division in collaboration with TAWIRI (Tanzania Wildlife Research Institute), launched a national large carnivores survey with the objective to monitor the status and population trends of lion, and other large carnivores, in the safari hunting areas of Tanzania, i.e. Game Reserves, Game Conservation Areas, and Open Areas, in a sample of hunting blocks over the main ecosystems of the country, i.e. Tarangire Manyara, Malagarasi-Moyowosi, Ruaha-Rungwa, and Selous Game Reserve:

- Prior to the surveys, a training workshop on large carnivores census methodologies took place in Lake Manyara National Park, on the 29th–31st July 2014, for 15 ecologists and managers of the Wildlife Division, TAWIRI, and TANAPA (Tanzania National Parks), with a special focus on the track incidence methodology (Funston et al. 2010). This methodology relies on the identification and the count of the spoors left on the ground by the large carnivores along portions of roads and rivers called transects. This is the key standardized technique applied to estimate lion abundance in locations where they are shy and elusive to the presence of humans. Tanzania utilizes also the standardized methodology of call-up surveys but preferentially long term observations of known individuals in Serengeti NP, Ngorongoro CA, and Tarangire NP has served as the primary technique of counting lions.

In 2014 and 2015, two major lion populations were surveyed, in Maasai Steppe Ecosystem (the Simanjiro Plains) and in the Selous Game Reserve:

- In the Maasai Steppe Ecosystem, two surveys were carried out in the Simanjiro Plains: (i) one in the dry season, in August-September 2014; (ii) one in the wet season in April-May 2015, in order to capture possible changes in lion densities due to seasonal movements of prey, hence lions too, in and out of Tarangire National Park. The sample comprised four hunting blocks, 5,386 km2 of the 26,708 km2 (i.e. 20%) covered by the hunting blocks on the eastern border of the Tarangire National Park. In the Tarangire National Park, there is already an ongoing lion project that provides regular population estimates. Results of the sampled portion of the Maasai Steppe provides an estimate of 1.3 lions x 100 km^2 (Equivalent to about 70 lions). The area is a key hotspot of human-lion conflict in Tanzania and lions suffer periodic persecution from Maasai pastoralists which explains the low density.

The final results are not yet available because the Simanjiro Plains are only a part of the Massai Steppe, and cannot therefore be representative of the entire ecosystem.

- In the Selous Game Reserve the survey took place in the typical dry season 2014, October- November 2014, over 10 of the 48 blocks of the Reserve. It covered several sectors, and included the two management regimes, i.e. photographic and hunting, for a total area of 11,385km^2, i.e. 25% of the Reserve. An additional survey took place during the 2015 wet season, in March 2015, in the photographic part of the Reserve. Results are given in table 1 and the final results has been submitted to a scientific journal awaiting publication.

Table 1: Summary of available lion population census surveys **since 2005** in Tanzania.

	Lion population	Management Regime	Size (Km2)	Last survey	No. surveys	Density (No./100 km2)	Source	Pop. Trend
0.	Countrywide	All	816,790	2010	N/A	Variable	Mésochina et al. 2010	Estimate 16.800
1.	Selous	Hunting	44,200	2015	3	3.8-4	Crosmary et al (In prep.)	Stable
2.	Selous	Photographic	800	2015	4	9	Crosmary et al (In prep.)	Stable
3	Selous	Photographic	800	2010	4	9	Brink 2010	Stable
4.	Rungwa GR	Hunting	9000	2012	1	6	Caso (2012)	Unknown
5.	Luganzo GCA	Hunting	2500	2012	1	5	Caso (2012)	Unknown
6.	Tarangire	Hunting	5386	2015	2	1.3	Ikanda et al (Inprep)	Unknown
7.	Moyowosi GR	Hunting	12.432	2007	2	3.3		Unknown
8.	Tarangire NP	Photographic	2800	2015	continuous	7.5	Laiser et al (2014)	Decrease
9.	Ngorongoro	Photographic	250	2014	continuous	22		Stable
10.	Serengeti NP	Photographic	14.763	2014	continuous	12.5		Stable
11.	Katavi NP	Photographic	4279	2005	1	4	Kiffner,2009	Unknown
12.	Lake Manyara NP	Photographic	132	2006	4	20	Ikanda & Kissui per comm	Stable
13.	Enduimet WMA	Photographic	751	2013	2	20	Kissui pers comm	Stable

Over the 516,900 km^2 of permanent lion presence range, 304,400 km^2, i.e. 61%, lie within protected areas gazetted as hunting areas, and 57,838 km^2, i.e. 11.4%, lie within National Parks (Mésochina et al. 2010).

Most lions are found in Protected Areas, with a population size estimated to be around 13,600 (i.e. 81.1%), and around 3,200 individuals in non-gazetted areas (i.e. 18.9%) (Ikanda and Packer 2006; Mésochina et al. 2010).

Of the estimated 13,600 lions in the Protected Areas in 2010, ca. 21.5% are in National Parks, and ca. 56.8% in hunting areas. (see Table VII in Mésochina et al. 2010).The remainder 21.7% are found in protected areas other than National Parks, which are not open for safari hunting, e.g., Forest Reserves etc.

Therefore, the protection of lion habitat and range in Tanzania largely relies on the existence of these areas gazetted as safari hunting areas.

As illustrated in Table 1 the vast majority of lion surveys in Tanzania have taken place in some of the main National Parks, and only sporadically outside these Parks, i.e. in other gazetted

areas or in not gazetted areas (but see Mésochina et al. 2010). Consequently, population trends are so far only available for few populations in some National Parks (Bauer et al. 2015). Therefore, updated information on population size, and on trends, is lacking for most lion populations in Tanzania.

Only in Serengeti NP, Ngorongoro CA, Tarangire NP, and Selous photographic sector (Matambwe) to a lesser extent, there were enough census surveys to reliably assess trends, i.e. with no doubtful interpolation.

Contrary to Bauer et al. (IUCN 2015) results for Matambwe (Selous photographic sector), lion numbers remained stable between 1993 and 2014 in that area.

Bauer et al. (IUCN 2015) selected sites for their assessment with: "The minimum number of census surveys per site over the assessment time period is two". Therefore, they should also have considered sites such as Selous (hunting management part) and Moyowosi GR where 3 and 2 census surveys respectively were carried out between 1993 and 2014.

Bauer et al. (IUCN 2015) kept Katavi National Park (KNP) in their sample, and they put the lion population in KNP at 0(zero), whereas only one census survey was carried out there, the one made by Kiffner et al. (2009) that estimated the adult lion population in KNP at 168 (CL 77-439) individuals in 2005.

Because there was no starting point, the analysis for Katavi could have been performed without doubtful interpolations based on guesstimates or extrapolations (Riggio et al. 2016; Tim Caro *in litt.* 2015). This contradicts what Bauer et al. (2015) wrote: "We did not include population estimates for sites which were based on extrapolation of Lion densities obtained by research in other areas, or informed guesstimates by researchers". And Professor Tim Caro who has worked in Katavi for years, publicly said: "It's simply not true that there are no lions in Katavi. If you go to the park now, you're going to see them around the tourist circuit."
http://www.sciencemag.org/news/2015/10/east-west-africa-could-lose-50-their-lions-2035

Such as for Katavi, one census survey has been carried out in Rungwa Game Reserve and Luganzo Game Controlled Area between 1993 and 2014, but Bauer et al. (2015) did not considered these two areas.

Based on these and other data, Tanzania has sent a letter to IUCN including a rebuttal of their Red List assessment for lion (Annex 1).

The Wildlife Division and TAWIRI have made it a priority to develop better trend data. The WD and TAWIRI launched a national large carnivores survey in 2014, with the objective to monitor the status and population trends of lion, and other large carnivores, in the safari hunting areas of Tanzania. The Wildlife Division is committed to improving the quality of data on Tanzania's lion population.

4. Legislation and Enforcement

Wildlife species in Tanzania, including African lions, are protected by law under the Wildlife Conservation Act No.5 of 2009, and its subsidiary legislations. The Act ensures there is suitable habitat in terms of space and provides for protection of plant species which is source of food for prey species of the African lion. Such habitat and food resources are also protected by other legislation such as the Tanzania National Parks Act (CAP 284 R.E. 2002), implemented and enforced by TANAPA and the Ngorongoro Conservation Area Act (CAP 282 R.E. 2002) implemented and enforced by the Ngorongoro Conservation Area Authority (NCAA).

Wildlife hunting in Tanzania occurs under the natural heritage of resident hunting and safari hunting. The safari hunting sector in Tanzania is governed by the Wildlife Conservation Act, No. 5 of 2009, the Wildlife Conservation (Tourist Hunting) Regulations of 2010 (now 2015) and the Wildlife Conservation (CITES Implementation) Regulations of 2005. The hunting season starts from 1st July to 31st December as per Closed Season Order of 2012.

Tanzania hosts the world's largest lion population and this is by virtue of regulatory mechanisms in place that guides and ensures the species conservation (Wildlife Conservation Act No.5 of 2009), and sustainable utilization as a national resource Wildlife Conservation (Tourist Hunting) Regulation, 2010 (now 2015). The Wildlife Act ensures that the species natural habitat is preserved alongside available prey species. Primarily, this is through a network of protected areas that conform to IUCN categories of protected areas. Secondary, the Act ensures that the species is protected by law even where it occurs beyond protected area boundaries.

4.1 Stakeholders in the conservation of lion.

The Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT) manages safari hunting in Tanzania. It is headed by Director of Wildlife and Assistant Directors responsible for Utilization, Law Enforcement, Development and Training. In Law Enforcement, there are zonal anti-poaching offices headed by zonal anti-poaching Commanders. There are eight anti-poaching zones, namely Arusha, Dar es Salaam, Songea, Tabora, Manyoni, Mwanza, Iringa and Bunda (Figure 1).

The Wildlife Division operates the Tanzania Wildlife Protection Fund (TWPF) which has the objective of facilitating and supporting wildlife conservation, inside and outside protected areas particularly in: anti-poaching operations and law enforcement; operations of the Wildlife Protection Unit; the conservation of wildlife; education, training and awareness creation in wildlife matters; capacity building in wildlife management; wildlife management research and any other activity related to conservation of wildlife.

Local Government Authorities (LGAs), that is District Councils (DC), are responsible for the implementation of wildlife policy within their jurisdictions by formulating and enforcing laws, and preparing sound physical and development plans that protects wildlife and habitat.

Wildlife Management Areas (WMA) represent the community based conservation system of Tanzania and they are seen as a key component of rural development and as one of the best weapons in the fight against illegal utilization. Safari hunting is an important component of WMAs' activities and revenues.

Hunting companies are responsible for supporting the government in the conservation, development and sustainable utilization of wildlife resources through investing in the wildlife sector. According to the Wildlife Conservation Act No. 5 of 2009, hunting companies are required to record and report relevant details of all animals killed, wounded, or captured.

The role of local and international NGOs is to support the government financially and technically in conservation, management and development of wildlife and ecosystem resources. In particular, the role of NGOs is to provide conservation education to the public, financial assistance to research projects and assistance to WMAs in wildlife management.

The following scientific research and conservation projects are beneficiaries of the above arrangements:

- African People and Wildlife Fund- http://afrpw.org/initiatives/wildlife-conservation/maasailand-lion-conservation/
- Ruaha Carnivore Project – www.ruahacarnivoreproject.com
- Serengeti Lion Project – www.lionresearch.org
- http://symbawildlifeconservation.org/alliance_projects/maasai_steppe_lion_conservation_alliance_project_-_mslcap_swc-tz
- The School For Field Studies - http://www.fieldstudies.org/about/research/tanzania

In order to insure that there is inter-agency cooperation in the protection of wildlife resources, the Wildlife Division is working with TANAPA, TAWIRI, NCAA, Police, TISS and Airport Authorities.

5. Safari Hunting in Tanzania

Safari hunting in Tanzania is consistent with a tourism policy of high quality products and low volume tourism and offers a unique experience due to the following reasons:

- Large wilderness hunting areas that assure high appreciation of client experience during hunting;
- Variety of trophy animal species, which are key in the safari hunting sector. These include: Leopard, Lion, Sitatunga, Puku, Gerenuk, Oryx, Greater and Lesser Kudu, Sable Antelope, Buffalo, Crocodile and the Elephant.

Safari hunting is conducted in areas known as hunting blocks designated in Game Reserves (GRs), Game Controlled Areas (GCAs), Open Areas (OAs), Forest Reserves (FRs) and Wildlife Management Areas (WMAs) (Figure 1).

In the current Tourist Hunting Regulations (2015), hunting blocks in Tanzania are classified into five categories based on criteria that include species diversity, the block being within/adjacent to a Game Reserve, bordering National Parks or Ngorongoro Conservation Area, habitat diversity, availability of water for wildlife, human activities, diversity of huntable species and infrastructure.

Hunting companies are allocated hunting blocks for tenure of five years' subject to annual review of the company's performance. The process of allocating hunting blocks for the 2013 to 2018 was concluded in 2011.

The Wildlife Division is evaluating the feasibility to increase the tenure of hunting blocks to ten years as long tenure can enhance sustainability by securing investments.

As prescribed by the Tourist Hunting Regulation, 2015, by 31st December of the third year of the hunting term, companies intending to renew the tenure of ownership of the hunting block must submit their applications to the Ministry, in the form of Performance Reports containing information on several criteria:

- the applicant has been utilizing the hunting block allocated to him and scores at least forty percent of the value of the key animals as specified in the Fourth Schedule to of the Regulations per hunting season;
- the level of revenue collected from photographic tourism depending on the category of the hunting block;
- whether the applicant has been contributing to the villages within and adjacent to his hunting block an amount of not less than USD 5,000.00 for each hunting block annually as a contribution to the implementation of various community development projects;
- the level of the applicant's contribution to the improvement of infrastructure and protection of the environment within his hunting block;
- the level of the applicant's contribution towards anti-poaching operations or defending against any other bad intentioned persons in issues of conservation of wildlife; and
- the applicant's record regarding the export of trophies to relevant clients.

Hunting Blocks are renewed after evaluation by the Hunting Block Advisory Committee established under section 38 of the Wildlife Conservation Act of 2009.

The Performance Reports for this term of Hunting Blocks (2013-2018) were received by 31 December 2015 and contain a wealth of information demonstrating the enormous contribution of hunting to habitat and wildlife conservation and to rural communities' livelihoods.

They are in the process of being forwarded to the Hunting Block Advisory Committee for evaluation.

Hunting Blocks are managed under the quota system whereby each block is assigned with a

specific number per species to be hunted in a given season after advice from the Quota Allocation Committee (See section 6.1).

Costs of management of Hunting Blocks are extremely high. A realistic estimate of costs of management incurred by hunting companies on a yearly basis ranges from 300,000 to 500,000 USD for each block. These costs are block specific and includes a variety of costs such as fuel, graders, camps, salaries, anti-poaching, cars, lorries etc. Lease agreements in Tanzania require assistance with anti-poaching from hunting operators in Hunting Blocks.

Safari hunting has created financial incentives for the development and/or retention of wildlife as a land use across an area of 304,400 km^2 in Tanzania, outside National Parks and NCAA, where Safari hunting is the primary land use as game reserves, or where trophy hunting is a key component of community conservation schemes. This is a system to conserve biodiversity in areas outside strictly protected areas where hunting is prohibited.

Safari hunting is viable in remote parts of the country that are not popular among photo-tourists (e.g. southern Tanzania). Hunting is able to generate revenues under a wider range of scenarios than photo tourism, including remote areas lacking infrastructure, attractive scenery, or high densities of viewable wildlife. Tourist hunting revenues are vital in part because there are not enough tourists to generate income for all protected areas. Even in the most visited countries such as Tanzania, photo tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of strictly protected national parks.

In Tanzania, for the past 6 years, revenues generated by hunting were 3 to 8 times greater than those generated by photographic tourism in areas managed by the Wildlife Division (Table 14 section 11). Hunting revenues can be generated with lower environmental impacts from fossil fuel use and habitat conversion for infrastructure development (among others see Di Minin et al. 2016).

The most important factor to be considered is that habitat and ecosystems conservation is the final objective in the conservation policy of Tanzania.

Safari Hunting is an important tool to maintain biodiversity i.e. a variety of ecosystems and species across Tanzania. Rapid human expansion and conversion of land to agriculture or livestock ranching and illegal activities can be controlled and limited through the value given to wildlife, the presence of hunting operators and the willingness of local communities to collaborate due to the returns they obtain from safari hunting, including protein, which is not generally available from photo tourism.

Research on the impact of hunting on biodiversity has shown that hunting (and its associated management) can be a strong driver in conserving biodiversity, because many of the objectives in hunting (maintaining healthy populations, preserving natural habitats, reducing limiting factors for game) are shared with those of wildlife management and conservation at large. (Fischer et al. 2013).

Financial resources for conservation, particularly in developing countries such as Tanzania, are limited. As such, consumptive (including Safari hunting) and non-consumptive (including photo tourism safaris) uses are both needed to generate funding. Without these, many natural habitats would otherwise be converted into agricultural or pastoral uses. Safari hunting can also have a smaller carbon and infrastructure footprint than ecotourism, and it generates higher revenue from a lower number of uses.

Wild areas of Tanzania provide biodiversity services, i.e. ecosystem services, through the provision of recreational opportunities such as hunting and the aesthetic enjoyment of the wildlife that utilize these landscapes.

Safari hunting plays an important role in the ecosystem services as defined in the Millennium Ecosystem Assessment (MA) (2005), i.e. "the benefits people obtain from ecosystems." Safari Hunting is both a provisioning and cultural service (two of the four categories) of services

identified by the MA.

The Safari hunting system in Tanzania where operators pays fees and other payments to encourage ecosystem and species conservation, and rural livelihoods, could be considered as a Payment for Ecosystem Services (PES). Its contribution in this regard and in the whole framework of Ecosystem Services shall be analyzed further and it is the intention of the Wildlife Division to start working on this subject as a priority.

5.1 Lion hunting in Tanzania

The lion is generally protected from all forms of consumptive use in Tanzania, with the exception of Safari hunting. Safari hunting is highly conservative and strictly controlled and thus does not constitute to the overutilization of the population (Table 5 and Figures 8, 9 and 10).

Safari hunting is an integral part of Tanzania's Lion and Leopard Conservation Action Plan (see section 8.1) because of its role in generating conservation revenue for national authorities and local communities, and its contributions to anti-poaching and habitat preservation. It must be noted that revenues generated from hunting are crucial to maintain the Wildlife Management Areas and are contributing to poverty reduction and socio-economic development.

The safari hunting sector's sustainability would be threatened by the loss of its main attracting product (the lion) combined with the loss of its main markets (the USA and EU). A lot of hunting companies operating will return most (if not all) of their hunting areas to the Wildlife Division to avoid bankruptcy. As a consequence, many protected areas devoted to safari hunting will be converted to agro-pastoral land, leading to the unavoidable extinction of wildlife and natural habitats and the collapse of ecosystem services. This will lead to an ecological disaster in Tanzania.

Hunting practices are managed under the best available science, which offers guidance/regulates quotas and target animal selection (see sections 5, 6 and 7).

5.2 Hunting Regulations of 2015 and their enforcement

The Wildlife Conservation (Tourist Hunting) Regulations, 2010 have been revoked and substituted by the Wildlife Conservation (Tourist Hunting) Regulations, 2015, published on 18th September 2015 in the Supplement No. 34 of the Subsidiary Legislation under Government Notice No. 414. (ANNEX 2). These regulations include five parts: (1) Preliminary Procedure for Application and Allocation of a Hunting Block, (2) Condition and Restrictions Relating to a Hunting Block, (3) Management and Supervision of Professional Hunters and (4) Miscellaneous provisions such as control of hunting quotas, offences and penalties, etc., Offence in Contravention of Standards Set, Offence for Hunting (which includes age restriction limit for lion hunting and related penalties) and (5) General Penalty.

The revision of regulations to address new issues is an important part of Tanzania's adaptive management process for safari hunting as recommended by scientists (e.g. WWF 1997; Whitman et al. 2004; Lindsey et al. 2012).

Huntable lions are defined as lions whose harvest has no negative impact on the sustainability of local lion population dynamic. Research has shown that these are typically males five years of age or more that have usually completed at least one breeding cycle (Whitman et al. 2004).

In light of the above, Tanzania has implemented the following:

- Include an age-based rule into the hunting Regulations;
- Strengthen the existing monitoring procedures for lion safari hunting;
- Develop capacity building within the safari hunting sector.

Within all the African lion range states, Tanzania has been the first country to officially establish age restriction rules on lion hunting at country level. It was clearly stipulated in sections 24(5)(a)

and 24(6) of the Tourist Hunting Regulations of 2010 (now superseded by section 27 (1) of the Tourist Hunting Regulations of 2015) that "*no person shall hunt lion of an age below six years*". Any professional hunter who guides a client to hunt any lion in contravention of the above Regulations commits an offence and upon conviction is liable for penalties, including cancellation of his or her professional hunters' license.

The Wildlife Division, Ministry of Natural Resources and Tourism, has since (i) published a legal guidance document enforcing the 2010 Regulations, (ii) gradually improved the monitoring and control mechanisms of lion safari hunting (see section 6.2) and (iii) continuously raised the professionalism of the hunting sector. These achievements place Tanzania well ahead of any other lion range state in terms of lion safari hunting monitoring, control and penalization of offenders.

These Regulations had as immediate effect to significantly reduce lion harvest and increase the average age of the lions harvested (see sections 6 and 7).

Since their entry into force, the enforcement of the 2010 Regulations has been developed through a participatory process involving representatives of the various stakeholders in Tanzania. Given the current state of knowledge regarding the age diagnosis of lion trophies, it is well recognized by the scientific community that a lion's age cannot be assessed without uncertainty (e.g. Whitman and Packer 2007; Ferreira and Funston 2010). In Niassa National Reserve, Mozambique, Colleen Begg stated that "*The 4-6 year age category is there because we appreciate that it is often difficult to tell the age of lions in this category as there is a lot of variation*." (Begg and Begg 2008). In Zambia, Paula White wrote in an unpublished report that "*While scientists and hunters alike agree that determining the exact age of a wild lion is not possible, assigning individuals to broader age categories is more straightforward*".

Following the guidance document referred above, the Wildlife Division has consequently adopted a system for adjusting the lion quota based on the age of previously harvested trophies (Figure 4) which includes:

- Accepted (6 years-old and above);
- Accepted with penalties (4 and 5 years-old);
- Not accepted with deterrent penalties (under 4 years-old).
- The age categories of lion trophies that can be exported: only trophies assessed to be at least 4 years-old are allowed for export;
- An aged-based lion quota-setting system: lion quotas are set for and allocated to each hunting area according to the age of the lions harvested during the previous hunting season, based on the following system:
- The quota is decreased by 1 for each lion harvested with an age of 4 and 5 years;

The quota is decreased by 2 for each lion harvested with an age under 4 years. In addition, any professional hunter who guided a client to hunt lions under 6 years old commits an offence and is liable on conviction:

- To a fine of US Dollars one thousand or imprisonment for a period not less than six months for the first time of commission of an offence;
- To a fine of US Dollars four thousand or imprisonment for a period not less than one year for the second time of commission of an offence; and
- To a fine of US Dollars ten thousand or imprisonment for a period not less than one year and a cancellation of the Professional Hunters' license for the third time of commission of an offence.

The rationale of this system is to direct hunting intensity to surplus/huntable lions. This strategy is more penalizing than the Niassa points system (Begg and Begg 2008).

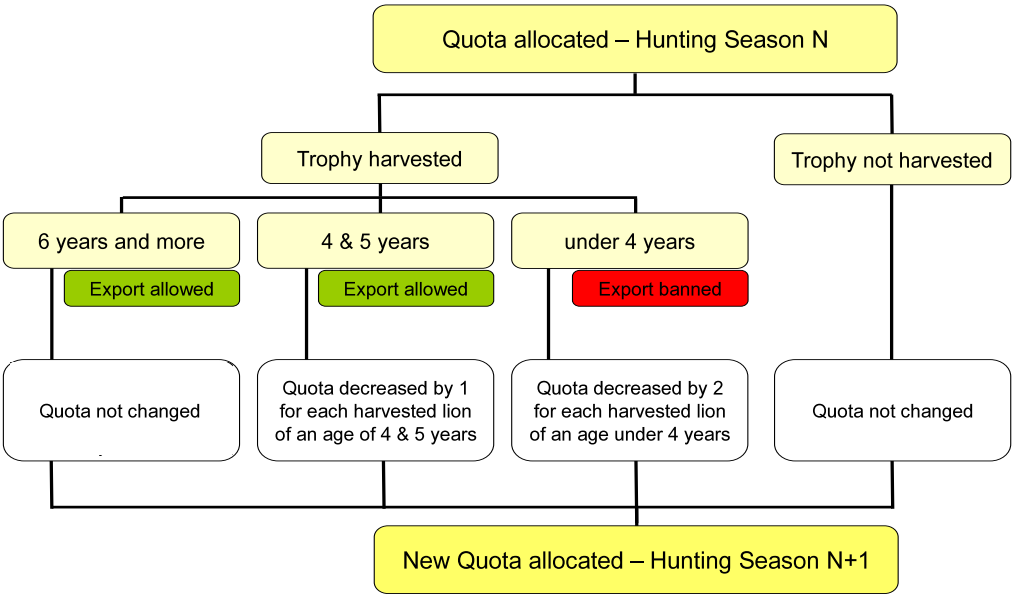


Figure 4: The Wildlife Division System for adjusting the lion quota based on the age of previously harvested trophies.

5.3 Capacity-building of the hunting sector

Before the onset of the 2012 hunting season, the hunting sector was informed of the new rules for enforcing the 2010 Regulations regarding lion hunting, trained for improving data collection (two workshops in 2012) and for identifying old enough huntable lions through (i) the production of written guidelines (age diagnosis of the lions in the field and data collection) and (ii) the organization of training sessions.

Capacity-building of the hunting sector is a continuous activity and there are plans to have workshops, preferentially prior to the hunting season, with hunting operators, professional hunters and Wildlife Division officers.

5.4 Involvement of the hunting sector in Lion Conservation

The mechanisms for monitoring and controlling lion hunting are well accepted by the hunting sector in Tanzania.

Representatives of the hunting sector were involved in the elaboration process of the Amendment of the 2010 Regulations. The Wildlife Division regularly explained the context and the rationale of that Amendment to the sector.

As a result, the hunting sector is well committed to fulfill their duties in regards to lion hunting monitoring and control.

Since 2011, every single lion harvested by hunters in Tanzania has been inspected by the Wildlife Division (i.e. 100%).

Safari operators have contributed and are contributing substantially to Tanzania's enhanced anti-poaching efforts and communities' development. They provide funding, equipment and the technical expertise for repairs, transportation, and most critically, funding for government game scouts as well as their own anti-poaching patrols.

Hunting Companies' anti-poaching teams acting in collaboration with the Wildlife Division Anti-Poaching Units, remove snares, prevent illegal logging, and arrest poachers in a coordinated and continuous effort.

This effort is also pointed toward assistance to rural communities in order to improve their livelihoods. Apart from the annual 5,000 USD contribution which is mandatory under the Tourist Hunting Regulations, the Safari Operators made enormous voluntary contributions aimed at health care, water provision, infrastructure developments for rural communities.(See also section 10)

These contributions amount to more than US$ 5,5 million for the triennium 2013-2015.

Table 2 below illustrate the contribution of Safari Hunting Operators from 2013-2015 and is compiled from information taken from the Operators Performance Reports referred in section 5.

Table 2 Contribution of 45 Safari Hunting Operators for Antipoaching, Block development and community development 2013-2015 (in USD).

Anti-poaching (USD)	Block Development (USD)	Community Development (USD)	TOTAL
1.871.894,00	**1.930.112,49**	**1.776.699,67**	**5.578.706,16**

These contributions include but are not limited to:

- Support of mobile antipoaching teams in collaboration with respective Game Reserve/District Council;
- Provision of graders for maintenances of existing roads;
- Acquisition or deployment of aircrafts/helicopters for aerial patrols, maintenance or development of airstrips, pilot training;
- Donation of 4x4 cars and motorcycles, deployment of boats for antipoaching;
- Donation and installation of radio equipment for communication;
- Donation of GPS devices and satellite mobile phones;
- Donation of firearms and ammunitions for antipoaching teams;
- Donation/building of class rooms/schools for rural communities, donation of stationery for schools;
- Donation/building of boreholes and water tanks for rural communities;
- Support health programs for rural communities.

5.5 Transparency

As recognized since the preparation and implementation of the Carnivore Action Plan of Tanzania (2009), transparency is essential for lion conservation. Tanzania maintains transparency through hunt return forms and requiring a government ranger participate in hunts, which make each hunt visible to the WD. Also, the WD requires annual reports from hunting operators, which allows for oversight of offtakes and understanding of benefits sharing and anti-poaching. The MNRT and WD are overseen by the rest of the government through audits. And Tanzania's wildlife management is transparent to the rest of the world through presentations to the international community on a number of occasions:

- 10th Annual African Wildlife Consultative Forum, 10-12th October 2011, Manzini, Swaziland;
- 7th International Wildlife Ranching Symposium, 12-16th October 2011, Kimberley, South Africa;
- General Meeting of the ACP (a Francophone Association of Professional Hunters), 21st October2011 Paris, France;
- 2nd Workshop of the African Lion Working Group, 10-11th February 2012, Etosha National Park, Namibia;
- 19th Session of the African Forestry and Wildlife Commission of FAO (United Nations Food and Agricultural Organization), 30th September-4th October 2013, Windhoek, Namibia;
- 12th annual meeting of the AWCF (African Forum of Consultation on Wildlife), 3rd-8th November 2013, Livingstone, Zambia;
- Annual General Assembly of the CIC (International Council for Game and Wildlife Conservation), 23rd-26th April 2014, Milano, Italy;
- Annual General Assembly of the AGGC (Association des Guides de Grande Chasse, Professional Hunters' Association), 10th June 2014, Paris, France;
- Game Fair, 13-15th June 2014, Chambord, France.

The USFWS acknowledged on page 80042 of the ESA Final Rule on lion (USFWS 2015) that Tanzania has implemented age restrictions and shown reductions in offtake; however, it reported that transparency (in terms of trophy quality data) and the scientific objectivity of the evaluating body has been questioned. We are puzzled and severely concerned by this unreferenced statement because of the various measures described above. Concerning independency of science this is open to debate knowing that lion scientists are financed from several sources including animal rights groups.

Questionably, and in contrast with the above page of the USFWS ESA Final Rule (USFWS 2015), on page 80024 it is stated: *"Unless reforms are made to the current management of trophy hunting, we expect the declines specifically documented from excessive offtakes in Benin, Cameroon, Tanzania, Zambia, and Zimbabwe to continue. Furthermore, we expect excessive harvests to further contribute to declines in the species across its African range*." This statement is simply untrue for Tanzania. The offtakes are not excessive.

Further, Tanzania's records of its implementation of the age restriction system are open to scrutiny to the international scientific community. Tanzania has requested several times to have independent scientists evaluate its system. Peer reviewers have done so. Tanzania has been and will continue to be open to such checks upon its process.

We are also puzzled by general allegations concerning corruption as reported in the USFWS ESA Final Rule (USFWS 2015).

The Government of Tanzania has taken important steps to address corruption with the support of the international community. Specifically, on hunting, several actions were taken against companies that infringed Laws and Regulations. Such general, unsubstantiated allegations are not helping our relationships. If the USFWS has precise, substantiated information on corruption in hunting practices in Tanzania, we urge the USFWS to provide the Government of Tanzania with facts and evidence in order that our enforcement and judicial system can act accordingly.

We are also requesting USFWS to provide to the Wildlife Division the source material of your statement on page 80017 of the USFWS ESA Final Rule on Lion(USFWS 2015):" *Although we acknowledge the steps many countries have taken to address local community incentives, most of the countries are currently not transparent about the benefits provided to local communities, and due to the high revenue potential, are subject to corruption (Packer 2015, pers. comm.)* as it is highly defamatory.

6. Lion hunting quotas and monitoring

6.1 Hunting quotas

The hunting quotas are based on data and other relevant information available in terms of the following criteria: species distribution, natural breeding history, recruitment rate and population estimates, which partly derived from regularly conducted censuses (large mammals), research work and indices as may be reflected in various reports by field personnel, through specific data forms. In essence, all species that are hunted every year must be included in the annual quotas that are determined by the Quota Allocation Advisory Committee comprised of wildlife conservation experts from TAWIRI, the University of Dar es Salaam, Sokoine University of Agriculture, University of Dodoma, the College of African Wildlife Management and the Wildlife Division (which is the CITES Management Authority). The Committee receive inputs on the wildlife situation from various stakeholders and meet once a year and minutes of the meetings are kept for reference, although in Swahili only.

The Wildlife Division monitors harvesting of lions through its quota system. Hunting companies are obliged to show the number of lions they shoot each hunting seasons through hunting returns, these numbers are verified by records from local wildlife officials (Park managers and District Game Officers) who supervise all hunting. This system also enables the monitoring for quality of trophies using the age restriction system which is implemented Offtakes are monitored through hunt return forms and the participation of government scouts. The system also includes, as explained in section 4.2, a reduction on the quota as a penalty for under-aged lions shot in a given block.

Furthermore, harvesting is also monitored through a CITES trophy export permit system; as lions are harvested for trophy by foreign tourist hunters that must export them. As Lion is a CITES listed species, it can be expected that a high level of international scrutiny will be applied to international trade in the species.

The Wildlife Division utilizes many years of cumulative experience in setting quotas that relies on several verifiable quantitative and qualitative indicators (mainly population estimates and trophy quality and off take levels etc.) that can demonstrate little or non-significant detrimental impacts on the populations.

Further to the discussion in section 2, lion surveys are conducted in several areas although a precise lion inventory is a difficult and sometimes impractical task. Therefore, Tanzania relies on the recommendation of establishing the quotas based on scientific recommended thresholds complemented by the lion aging system.

Until this year, Tanzania maintained a quota of 315 lions as sport-hunting trophies, with the age restrictions as a secondary quota. That number was in line the recommendation of 1 lion/2000Km^2 for most hunting areas, and 1 lion/1000Km^2 for the Selous Game Reserve, given that the lion range in Tanzania of 516,900 km^2 of permanent presence and 232,800 km^2 of temporary presence. This quota was maintained because it was in line with available science and not detrimental to the survival of the species. However, the utilization of this quota was low, almost never above or even at 50% (see Table 5).

Following consultations with the Scientific Authority (TAWIRI), the CITES Management Authority (WD) has decided to introduce a new export quota for lion hunting trophies of 200 specimens. This will be effective at the start of the next hunting season, commencing in 1st July 2016, and an official instruction has been signed by the Director of Wildlife (Annex 7).

This new quota is (i) a reduction of one third of the previous quota and (ii) 25% below the sustainable harvest level suggested by the CITES Scientific Authority (TAWIRI) and Packer et al. (2011), i.e. 1 lion/2000Km^2 for most hunting areas, and 1 lion/1000Km^2 for the Selous Game Reserve and other high density areas, and taking into account the lion range in Tanzania (permanent presence range for lion of 516,900 km2, and a temporary presence range of 232,800 km^2).

The new quota is a further precautionary measure, complementing the strict age restriction regulation implemented since the entry into force of the Tourist Hunting Regulations of 2010. It is a three tier limit, i.e., age, number per square kilometer, and maximum overall number. It made sense to the Management Authority to reduce the quota because the prior quota was never utilized fully, and the low level of offtake in recent years demonstrates Tanzania's commitment to sustainable hunting. (Annex 7).

Therefore, we do not concur with the analysis provided on page 80021 of the USFWS ESA Final Rule (USFWS 2015):

Other range countries continue to have fixed quotas in place and charge a percentage of the quota regardless of success (CAR charges 50 percent; Namibia 100 percent; Tanzania 40 percent; Zambia 60 percent; Zimbabwe 30 percent). This approach facilitates harvesting of trophies even if a sufficiently old lion is not found (Hunter et al. 2013, p. 6). Therefore, harvested lions are often of lower quality, younger, and less desirable male lions, as operators and hunters, who had already paid the trophy fee, had no incentive to be selective. Abolishing fixed-quota fees and only allowing optional quotas will encourage and reward operators who are selective and follow age restrictions (Lindsey et al. 2013a, p. 9; Packer et al. 2006, pp. 5, 9).

In fact, the mandatory payments for key animals required from operators and monitored during the three years' term of Block renewal, are based on the value of the key animals (at least 40% of the value) as stipulated in section 16.5 of Tourist Hunting Regulation 2015 and calculated in accordance with the Fourth Schedule of the same Regulation. It does not mean that the quota is fixed but it is an indicator of hunting performance and wildlife abundance in the assigned hunting block.

The administrative and management system of hunting in Tanzania is complex and this complexity need to be understood before criticizing it.

Tanzania firmly emphasizes that, well before this new significant reduction of hunting quotas, the age restriction provision had already succeeded to decrease offtakes and to maintain them way below the sustainable threshold levels. Indeed, since the implementation of the Tourist Hunting Regulations of 2010 and the adoption of the 5/6-years of age provision to harvest lion an impressive number of very positive results have already been obtained:

- Offtake has been reduced to about 40 lions per year;
- Offtake levels, both at national and regional scales, have been kept way below the sustainable harvest rates suggested by Packer et al. (2011); and
- The average age of the harvested lions has increased, with a proportion of lions above 6 years' old that is ten (10) times higher in 2014 than in 2011.

By implementing the peer-reviewed (independent experts are conducting the lion aging review) age restriction provision six years ago, Tanzania in fact already set up a mechanism that is far stricter than the suggested sustainable offtake threshold levels. Had Tanzania simply followed these suggested thresholds, offtakes would have most probably remained three to four times higher than they have been in the past five years, i.e. at levels prior to the 2010 Hunting Regulations (see Table 5).

In addition to the continued assessment and monitoring of human-lion conflicts and habitat loss outside protected areas, which are unanimously recognized as the two main threats to lion conservation (IUCN, 2006a, b), Tanzania is committed to keep on (i) monitoring lion hunting and (ii) assessing the impact of the Tourist Hunting Regulations of 2010 (amended 2015) on the sustainability of lion hunting.

The pressure and impact of hunting are monitored through measures of hunting statistics such as harvest rates, catch rates, age of harvested males, and estimates population size and structure.

6.2 Mechanisms for monitoring lion hunting in Tanzania and mechanisms for controlling the age of trophies

The monitoring of the lion hunting (Figure 5) is carried out through the implementation of a specific database and a specific safari return form (Figure 6). Based on all hunting permits issued by (and compulsorily returned to) the Wildlife Division, a specific database has been set up to record lion hunting harvests. Regularly updated, the database is used to follow-up lion Safari hunting activity and trophy skulls that must be presented to the Wildlife Division for inspection.

Since mid-August 2011, all professional hunters conducting lion hunting safaris are required to fill in the safari return form for both successful and unsuccessful safaris. With this form general information on the course of the safari, the lion population status and lion Safari hunting success are collated. For the successful lion hunting safaris, additional information like the hunting effort, specific measurements (total length and shoulder height) and specified photographs are taken. Safari return forms and trophy photographs are compulsorily provided by the hunting companies to the Wildlife Division. No CITES export permit can be issued without compliance.

In 2011, a temporary lion hunting database was set up for registering data on lion safari hunting including hunting permits. This database, built from hunting permits and safari return forms, hosted data such as how many lions have been hunted, by which hunting operator, which professional hunter, in which hunting area, for how many hunting days, etc. Such information allowed following-up not only lion safari hunting activity (e.g. hunting effort, hunting success), but also lion trophies submitted by the hunting operators.

Starting in 2012 the Ministry of Natural Resources and Tourism introduced an electronic permitting system for Safari hunting and Photographic Tourism activities in order to increase efficiency, transparency and revenue collection.

The objective of this system was to intensify revenue and data collection, control quota utilization and increase efficiency in issuing hunting permits. Since the system became operational the Ministry has reduced time previously spent in processing hunting permits, collection of revenue and assessment of quota utilization by company.

Hunting companies are required to complete Safari hunting permit application forms. This form requests company information, client particulars, Hunting Safari particulars, list of observers and animals to be hunted. Hunting companies can complete electronically at their office or hard copy and submit at the Hunting offices in Dar or Arusha. After completion of the form, invoices are issued to the company based on the package and number of observers if any. Currently there are 5, 7, 10, 16, 21 and 28 day safaris. After payment of the hunting permit at the account department, accountants confirm the payment online to allow for issuance of hunting permits at the Safari hunting Section.

Hunting companies present a proof of permit payment at the Safari hunting Section and collect hunting permits. However, If the company has pending dues, the system blocks all services until all unpaid invoices are cleared.

After the expiration of hunting package as indicated in the hunting permit, hunting companies are required to submit all hunting permits and pay all government dues within 42 days. Information about the number of wildlife species hunted, areas where hunted, caliber of firearm used, time and block where the game was hunted are recorded in the system. Invoices are created based on the number of game shot. In case of over use of the quota companies are penalized direct from the system.

The system deducts the number of animal hunted from the quota uploaded in the system. The system indicates the quota balance from each animal species. In this regard, over utilization of the hunting quota issued to a company is controlled.

The system is password protected and the user numbers are restricted within the Ministry and they need their own internal account which is monitored by an administrator of the IT section of

the Ministry. The Hunting Companies and Photographic companies can log into to the system to submit their applications. The system can generate daily, weekly, monthly and annual reports and several queries can be made.

6.3 Aging System

Concerning the aging system, we are pleased that USFWS recognized that our lion aging system has decreased legal offtakes. We are puzzled by the transparency remarks raised by USWFS in their Final Rule and we addressed them in section 5.5.

In 2015 stakeholders from the hunting sector were invited to witness the lion aging sessions. In the near future the Tanzania Wildlife Division is going to call more independent reviewers to evaluate its lion aging system.

Given the current state of knowledge, ageing lion trophies requires the use of subjective and objective criteria. In order to diagnose the age of lion trophies as accurately as possible the Wildlife Division uses the whole set of criteria recommended by the scientific community (Smuts et al. 1978; Cheater 2006; Whitman and Packer 2007; Ferreira and Funston 2010; White 2010; Niassa Lion Project). However, the research is on-going for a more objective method, so the Wildlife Division carefully monitors scientific developments likely to improve the age diagnosis of lion trophies. To this end, the Wildlife Division launched in October 2012 a field study to measure various criteria in known age wild lions in collaboration with the Tanzanian Wildlife Research Institute. The results are shown in section 6.3.4.

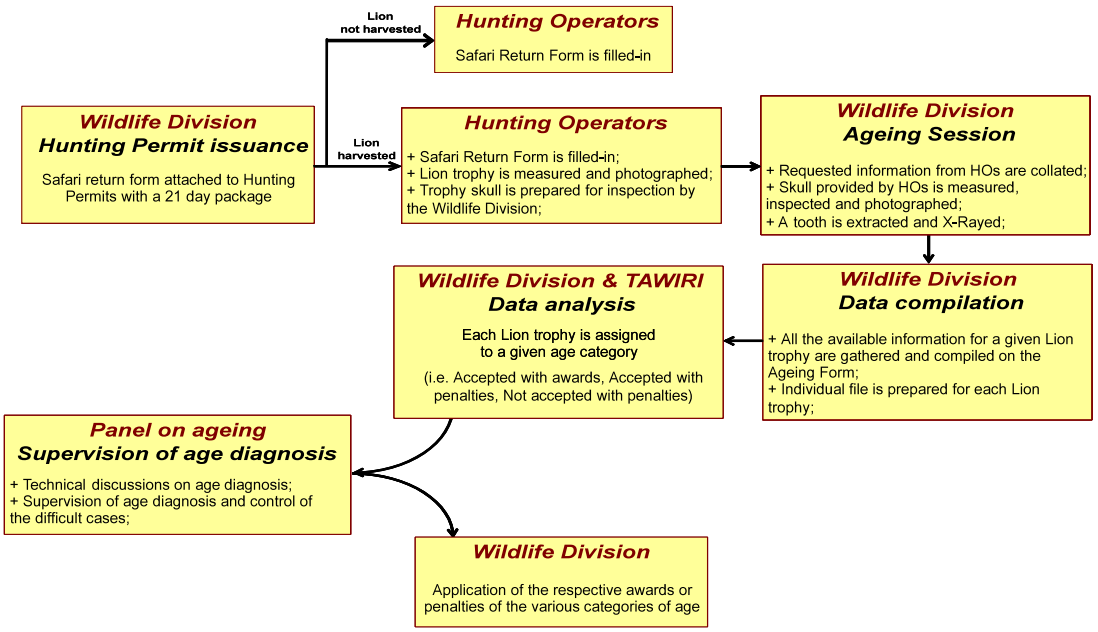


Figure 5: The Wildlife Division mechanism for monitoring and controlling the lion safari hunting in Tanzania (HOs: stand for hunting operators).

MONITORING OF LION TOURIST HUNTING
- SAFARI RETURN FORM -
PLEASE FILL OUT ONE FORM FOR EACH LION SAFARI

Date (month/year):	
Hunting Area:	
Safari Hunting Company:	
Professional hunter:	
Client name and nationality (optional):	
Hunting permit number:	

COURSE OF THE SAFARI

Type of Safari (number of hunting days):	☐ 21 days	☐ Other:		
Have you effectively looked for a lion to hunt during the Safari?	☐ Yes	☐ No		
Number of effective hunting days:				
Estimated number of kilometers covered during the Safari:	By car	By foot	Total	
		+	=	
Number of different solitary lions seen during the Safari:				
Number of different lion prides seen during the Safari:				

Total number of different individual lions seen during the Safari (solitary + in pride):	Adult		Sub-adult	Cub	Total
	Male	Female			
	+		+	+	=
Number of different "trophy lions" seen during the Safari:					

IF A LION WAS HARVESTED

Date of harvest:		
How many hunting days were needed for harvesting the lion?		
Location of harvest (GPS in decimal degrees):	GPS S:	
	GPS E:	
Give your own estimate of the lion' age:		
Condition of the lion harvested:	☐ Healthy	☐ Wounds
	☐ Thin	☐ Snares

REMARKS:

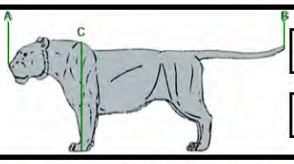
… See next page

Figure 6: Lion Safari Return Form Part I (Part II next page)

TROPHY MEASUREMENT AND PHOTOGRAPHY

Total length (A-B: tip of the nose to end of the tail): cm

Shoulder height (C: tip of scapula to back of plantar pad): cm



Side view showing the entire body with the hunter positioned directly behind for scale

Side view of the head, neck and shoulder showing mane development

Head down, showing mane development on head and shoulder

Head up, showing mane development on throat and chest

Face head, showing shape and scarces

Frontal view of the teeth, showing coloration and wear on canines and incisors. At time of hunt for color!

Nose, not too close and clearly showing the pigmentation. At time of hunt for color!

BIOLOGICAL SAMPLING

Please note that two blood and two skin samples are required per lion.

Blood sample: Place the filter paper on bullet wound or another source of blood until blood soaks through, air dry for 10-15 minutes in the shade, place in a small plastic bag inside the larger plastic bag and store in a cool place.

Skin sample: Cut a small piece of skin (3-4mm), place it into a tub filled with alcohol 70 or 90° (ethanol) and put the tub in the larger plastic bag.

…thanks for your help!

6.3.1 Inspection of lion trophies

The control of the harvested lion trophies is conducted during ageing sessions where hunting operators are requested to bring the skulls of their lion trophies for inspection at the Wildlife Division. This step is compulsory for the issuance of a CITES export permit.

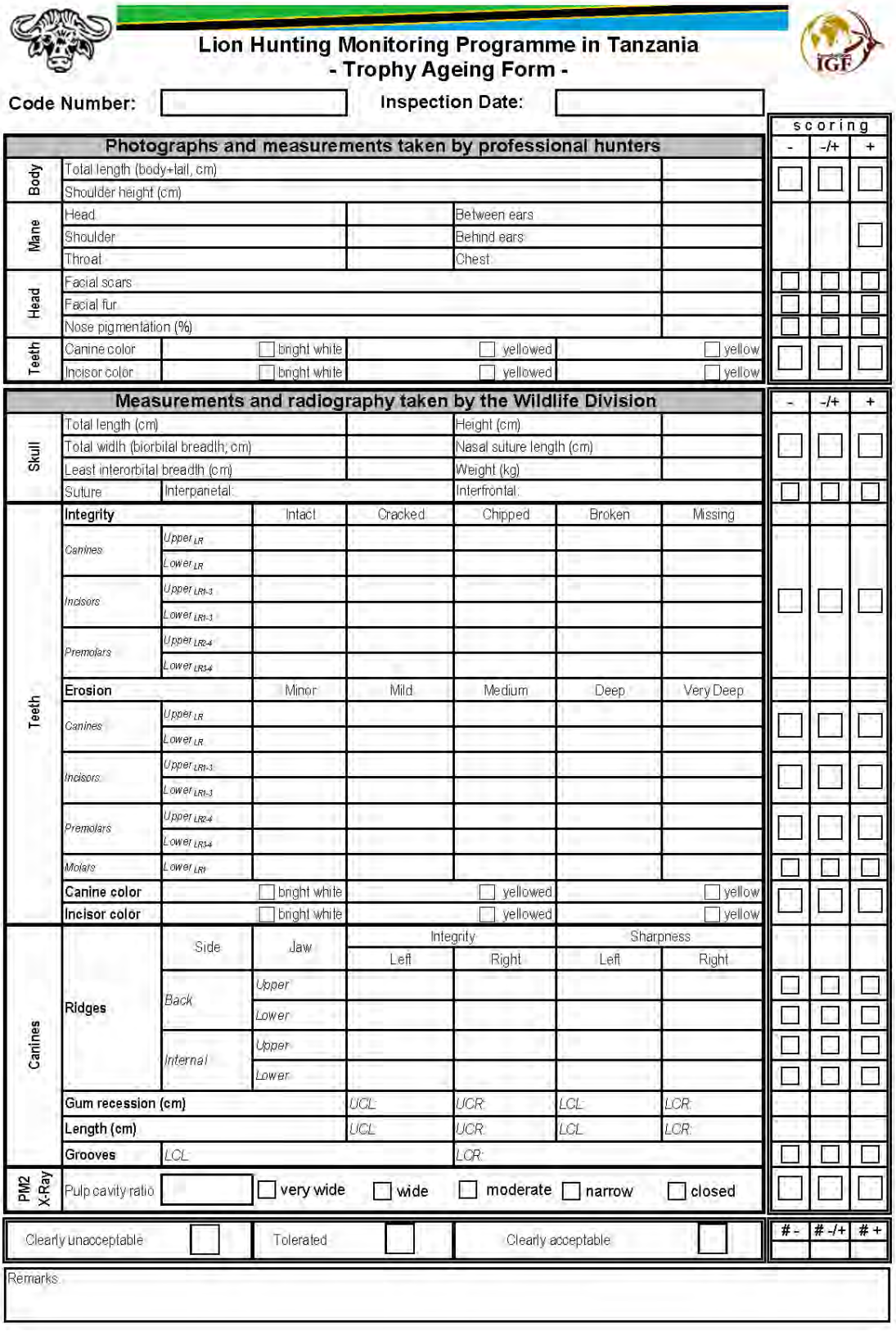
Upon reception, each skull is identified by a unique code number. A minimum set of 20 pictures of the skull is taken from various angles. The pictures allow potential control of the inspection at a later stage. The inspection of the skull encompasses:

- The measurement of quantitative parameters describing the skull. A set of 15 measurements are taken for describing the skull (e.g. total length, biorbital breadth, canine lengths, etc.). Some of the parameters measured have been shown to predict the lion's age under three years of age only (e.g. skull total length, in Smuts et al. 1978). Some other parameters, to our knowledge, have not been tested yet. The aim of taking new measurements is to test whether new parameters can predict the age of trophies and potentially propose scientific research.

- The detailed qualitative inspection of the skull. Each tooth is carefully inspected in regards to its integrity and erosion; additively the integrity and sharpness of the enamel ridges of the canines are assessed, as well as groves on the lower canines. The diagnosis of age is based on published chronologies of tooth eruption and wear in relation to the age of lions (e.g. Smuts et al. 1978; Whitman and Packer 2007). The closure and obliteration of cranial sutures are also assessed (Smuts et al. 1978).

- The X-ray radiography of an upper pre-molar 2 (PM2). One PM2 is extracted and X-rayed to measure the relative size of the pulp cavity (e.g. Cheater, 2006; Whitman and Packer 2007). The pulp cavity fills as individuals age. In lions, the pulp cavity of the upper PM2 is initially wide, and gradually fills as the lion ages. The cavity is closed by approximately 5 years of age (Whitman and Packer 2007).

All the information recorded during ageing sessions is collated in a specific synthetic ageing form (Figure 7).



Lion Hunting Monitoring Programme in Tanzania
- Trophy Ageing Form -

Code Number: _____ **Inspection Date:** _____

						scoring		
Photographs and measurements taken by professional hunters						-	-/+	+
Body	Total length (body+tail, cm)					☐	☐	☐
	Shoulder height (cm)							
Mane	Head			Between ears				☐
	Shoulder			Behind ears				
	Throat			Chest				
Head	Facial scars					☐	☐	☐
	Facial fur					☐	☐	☐
	Nose pigmentation (%)					☐	☐	☐
Teeth	Canine color	☐ bright white		☐ yellowed	☐ yellow	☐	☐	☐
	Incisor color	☐ bright white		☐ yellowed	☐ yellow			

								-	-/+	+
Measurements and radiography taken by the Wildlife Division										
Skull	Total length (cm)				Height (cm)			☐	☐	☐
	Total width (biorbital breadth; cm)				Nasal suture length (cm)					
	Least interorbital breadth (cm)				Weight (kg)					
	Suture	Interparietal:			Interfrontal:			☐	☐	☐
Teeth	**Integrity**		Intact	Cracked	Chipped	Broken	Missing			
	Canines	$Upper_{LR}$						☐	☐	☐
		$Lower_{LR}$								
	Incisors	$Upper_{LR1-3}$								
		$Lower_{LR1-3}$								
	Premolars	$Upper_{LR2-4}$								
		$Lower_{LR3-4}$								
	Erosion		Minor	Mild	Medium	Deep	Very Deep			
	Canines	$Upper_{LR}$						☐	☐	☐
		$Lower_{LR}$								
	Incisors	$Upper_{LR1-3}$						☐	☐	☐
		$Lower_{LR1-3}$								
	Premolars	$Upper_{LR2-4}$						☐	☐	☐
		$Lower_{LR3-4}$								
	Molars	$Lower_{LR1}$						☐	☐	☐
	Canine color	☐ bright white		☐ yellowed		☐ yellow		☐	☐	☐
	Incisor color	☐ bright white		☐ yellowed		☐ yellow				
Canines	**Ridges**	Side	Jaw	Integrity		Sharpness				
				Left	Right	Left	Right			
		Back	*Upper*					☐	☐	☐
			Lower					☐	☐	☐
		Internal	*Upper*					☐	☐	☐
			Lower					☐	☐	☐
	Gum recession (cm)			*UCL:*	*UCR:*	*LCL:*	*LCR:*			
	Length (cm)			*UCL:*	*UCR:*	*LCL:*	*LCR:*			
	Grooves	*LCL:*			*LCR:*			☐	☐	☐
PM2 X-Ray	Pulp cavity ratio	☐ very wide	☐ wide	☐ moderate	☐ narrow	☐ closed		☐	☐	☐

Clearly unacceptable ☐	Tolerated ☐	Clearly acceptable ☐	# -	# -/+	# +

Remarks:

Figure 7: Ageing Form.

6.3.2 Analysis of collated information

Together with the information recorded during the ageing sessions, the measurements of the lion harvested (safari return form) and the analysis of the photographs taken by the professional hunter are collated in the synthetic ageing form.

In the safari return form, professional hunters are asked to measure the total length and the shoulder height of the lion harvested. Shoulder height is a good predictor of the age of a lion younger than 2 years of age (Ferreira and Funston 2010).

Photographs of the lion harvested taken by the professional hunter are used to diagnose the age of the lion harvested based on (i) mane development, (ii) facial markings, (iii) nose pigmentation and (iv) coloration of canines and incisors (Smuts et al. 1978; Whitman and Packer 2007; White 2010; Niassa Lion Project).

A scoring mechanism is then applied to each criterion, resulting in a global score used to assign the harvested lion to an age category (Figure 7).

6.3.3 Validation of the age diagnosis

The integrative approach used by the Wildlife Division for diagnosing the age of lion trophies has been validated through the organization of blind-tests involving renowned lion experts. Lion experts were provided with photographs and measurements of a few lions harvested during the 2011 hunting season and were asked to age them.

The Wildlife Division invited three renowned lion experts to review the ageing process implemented in Tanzania. Each expert has received the full set of information collated (measurements of the skull, pictures of the trophy and the skull, X-ray of an Upper Premolar 2) for a number of samples ranging from 5 to 12 and was asked to diagnose the age of the trophies. Three experts gave the feedback of the blind test at the time by 15/12/2012, resulting in the review of 22 items with repetitions (Table 4). Overall, only five trophies were not attributed to the same age category, of which four shared a common category. As a result, the only discrepancy (i.e. 5% of the trophies reviewed) concerned a case where the reviewer diagnosed an age of 4/5 years while the Wildlife Division attributed the trophy to the CU category (under 4 years).

Table 4. Results of some blind tests conducted by three lion experts.

#	Reviewer I		Reviewer II		Reviewer III		WD
	Raw	WD categories	Raw	WD categories	Raw	WD categories	
A			5 years	To			To
B			5/6 years+	To (CA)			To (CA)
C			4-5 years	To			To
D					5 years	To	To
E			4 years	To			To
F					7/8 years	CA	CA
G	4-5 years	To	5/6 years+	To (CA)	5 years	To	To (CA)
H			4 years	To			To
I					3 years	CU	CU
J	4-5 years	To	4 years	To			To
K	4-5 years	To	5/6 years+	To (CA)			To
L			5 years	To			To
M			3 years	CU	3 years	CU	CU
N	4-5 years	To	3-4 years	CU (To)			CU
O	4-5 years	To	5 years	To			To

Age Category used by the Wildlife Division (WD):

CA 6 years and more

To 4-5 years

CU under 4 years

To (CA) might be 5 years but attributed to CA due to benefit of doubt

Cu (To) might be 3 years but attributed to To due to benefit of doubt

6.3.4 Development of an age diagnosis tool

Given the current state of knowledge in the methodology for ageing lion trophies, it is well recognized by the scientific community that a lion's age cannot be assessed without uncertainty (e.g. Whitman and Packer 2007; Ferreira and Funston 2010).

The Wildlife Division, with the intention of improving its age diagnosis methodology, has recently launched a study in collaboration with TAWIRI. The aim of the study is to develop a quantitative age diagnosis tool. It is well known that pulp cavity of teeth closes with age in mammals. Although the relative sizes of pulp cavities in teeth are frequently used to diagnose age of carnivores (e.g. jackal, wolf, Iberian lynx, coyote, lion), the validation of the technique has received little attention.

For the African lion, we lacked a calibration study measuring the degree of closure of pulp cavity in wild specimen of known-age. Long-term studies on lion populations in Northern Tanzania offer a unique opportunity for improving the knowledge in ageing lion, since birth date are known for a significant number of lions.

TAWIRI has conducted a study in October 2012 and January 2014 where sixteen known-age male lions were sampled (including X-Ray of lion teeth). The dataset has been analysed together with a sample from South African lions to show that there is a positive relationship between pulp cavity closure rate and age in lions of 3-13 years of age, with accuracy of within six months. Findings of the study will enhance the capability of the WD to monitor the ages of hunting-harvested lions and more effectively enforce age restriction.

Now, the Wildlife Division plans to adjust (if necessary) the preliminary age diagnoses resulting from former trophy inspections.

Finally, the protocols for sampling and age estimation of hunted lions are well-established, and significant improvements have been made for estimating lion age.

Thanks also to the above lion aging protocols developed in Tanzania and from data obtained from measurements taken from lions aged 3–13 years for which exact ages were known, a method of calculating the pulp/tooth area ratio, which has been used extensively in forensic science, was recently described and is novel in the study of lion aging. *Ratio Of tooth AReas* (ROAR) offers improved lion age estimates for population modeling and investigations of age-related mortality, and may assist national and international wildlife authorities in judging compliance with regulatory measures involving age (White et al. 2016).

6.3.5 Age of the harvested lions

Since the implementation of the Tourist Hunting Regulations of 2010, and the adoption of the 6 years of age approach in Tanzania, the proportion of harvested males above 6 years old has exponentially increased from 10,6% to 88.2%, whereas the proportion of harvested males below 4 years old decreased from 22.4% to 5.9% (Figure 8).

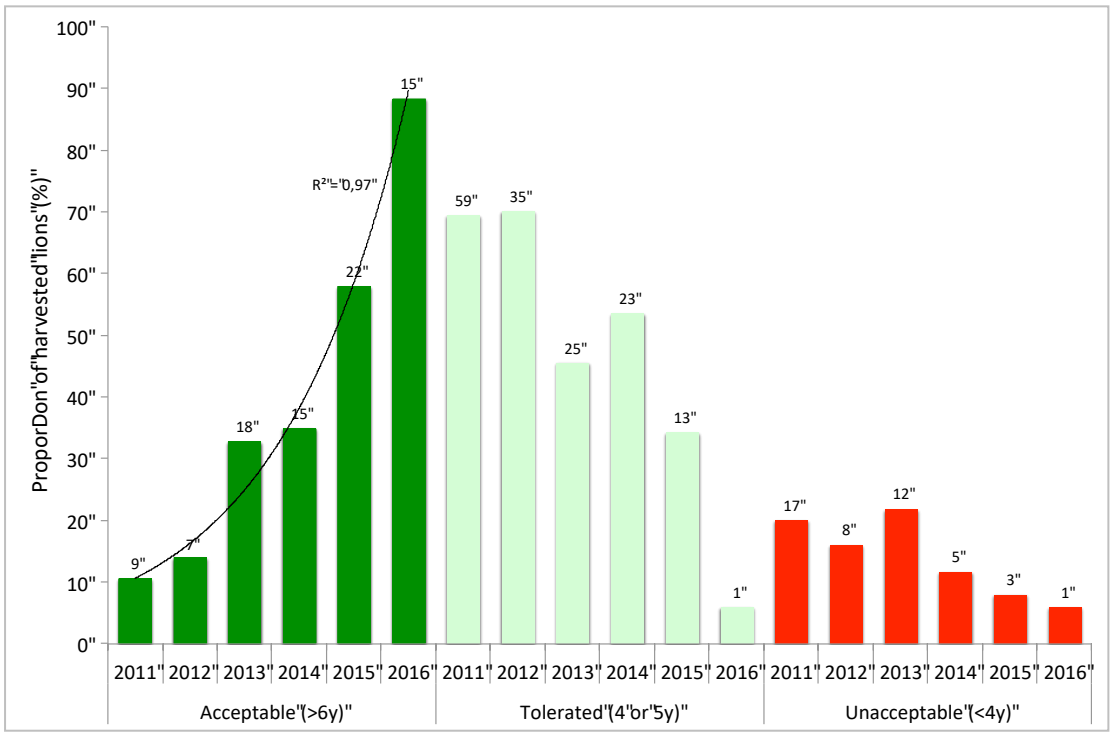


Figure 8: Annual proportion (and number) of harvested lion males in each age category since 2011 in Tanzania.

Similarly, the proportion of harvested lions of six years old and more has drastically increased in almost every ecosystem, but in Serengeti (Figure 9).

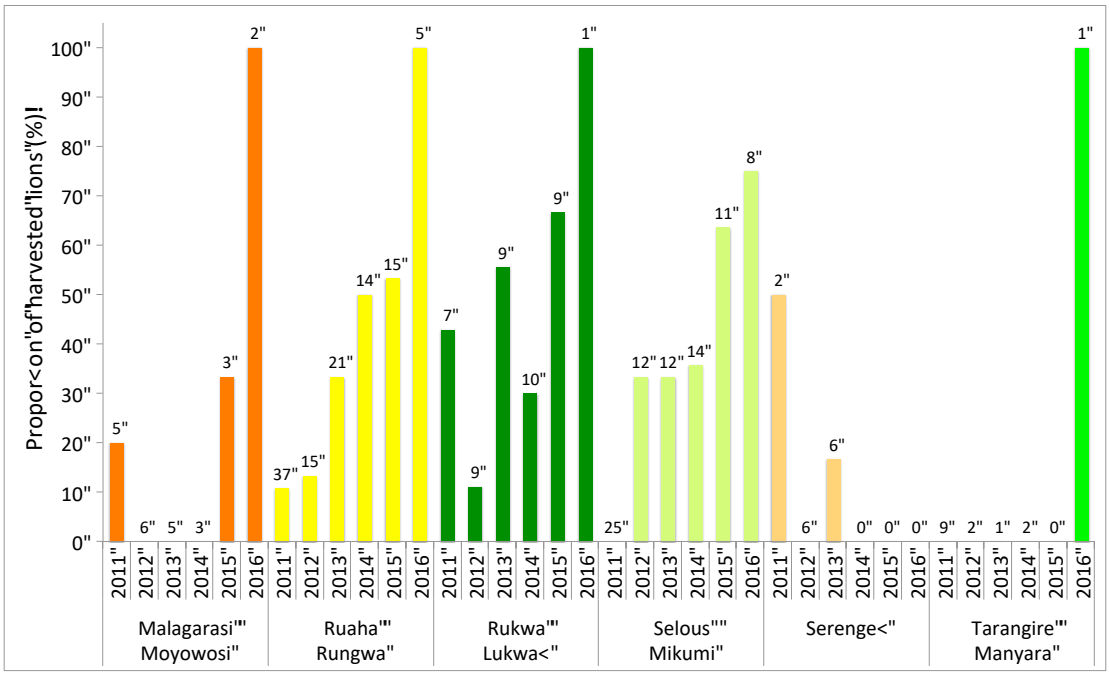


Figure 9: Annual proportion (and number) of harvested lion males of 6 years old and in the main ecosystems of lion range in Tanzania since 2011.

7. Annual harvest levels and international trade

7.1 Harvest levels

Considering the latest available estimate of lion population size in Tanzania (i.e. 16,800; Mésochina et al. 2010), safari hunting harvested a yearly mean of 1.34% (min: 0.53%; max: 2.46%) of lion males ranging in the country, for the past ten years (Table 5). This figure is considered as low and has decreased since the establishment of age restriction rules on lion hunting, i.e. the Tourist Hunting Regulations of 2010.

Table 5: Lion harvest for safari hunting over the past ten years in Tanzania.

Hunting season	Harvest of lion hunting trophies		
	Number	% of lion population	% of adult male population*
2007	146	0.87	2.17
2008	165	0.98	2.46
2009	132	0.79	1.96
2010	101	0.6	1.5
2011	85	0.51	1.26
2012	50	0.3	0.74
2013	54	0.32	0.8
2014	44	0.26	0.65
2015	39	0.23	0.6
2016	19	0.11	0.29

* A conservative adult sex ratio of 0.4:1 was used

Across the main ecosystems of lion range in Tanzania, between 2007 and 2016, average lion harvest rates[2] have remained below the sustainable levels, but in the Ruaha Rungwa and Serengeti ecosystems at some occasions (Figure 10).

[2] As a reminder, the harvest rate is the number of lions harvested per surface area, e.g. per 1,000km^2. This index is used to monitor the hunting pressure on harvested species.

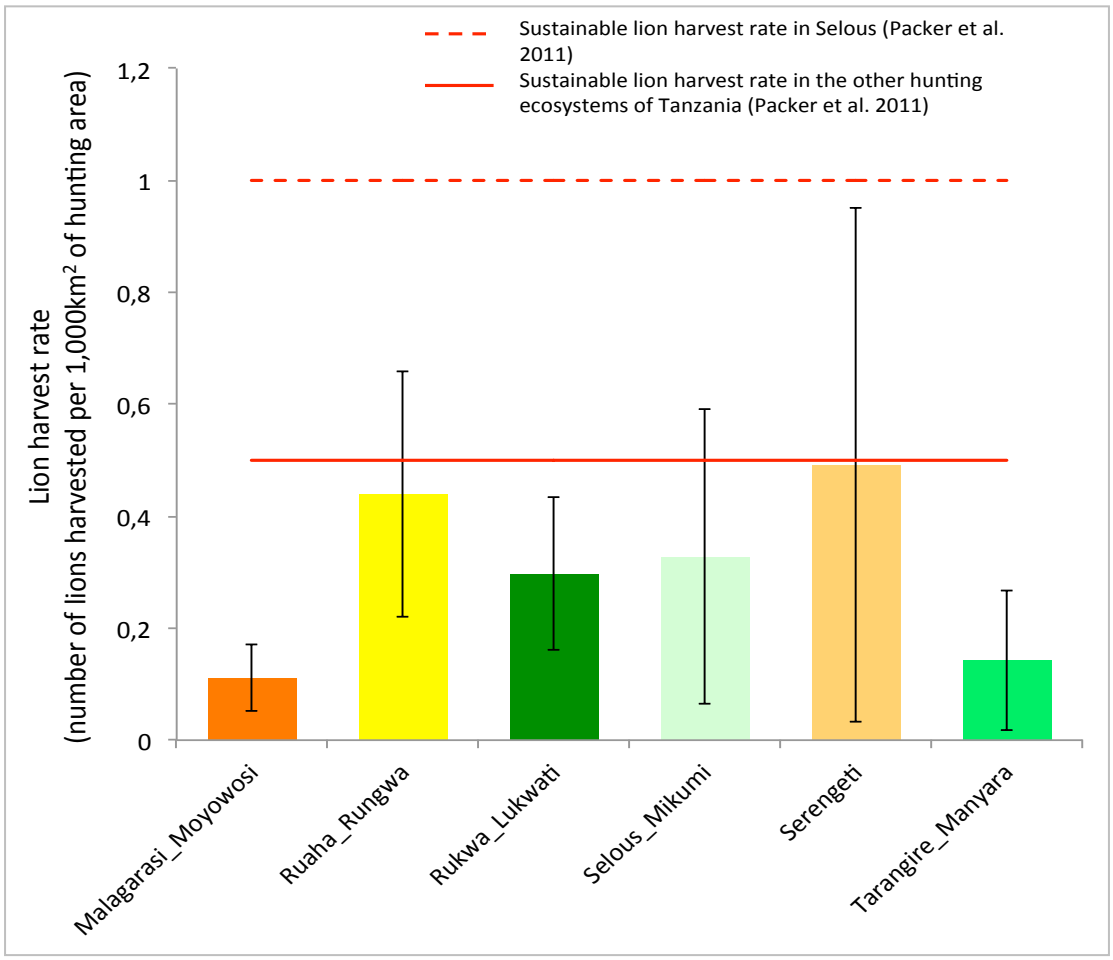


Figure 10: Average regional harvest rates in the main ecosystems of the lion range in Tanzania between 2007 and 2016 (with standard deviations).

The lion harvest rates in the period following the Tourist Hunting Regulations of 2010, were in average lower than the harvest rates of the preceding period, in every ecosystem (Figures 11,12,13). In each ecosystem, harvest rates remained in average below sustainable levels after 2010, while they exceeded sustainable levels in Ruaha Rungwa and Serengeti during the previous period.

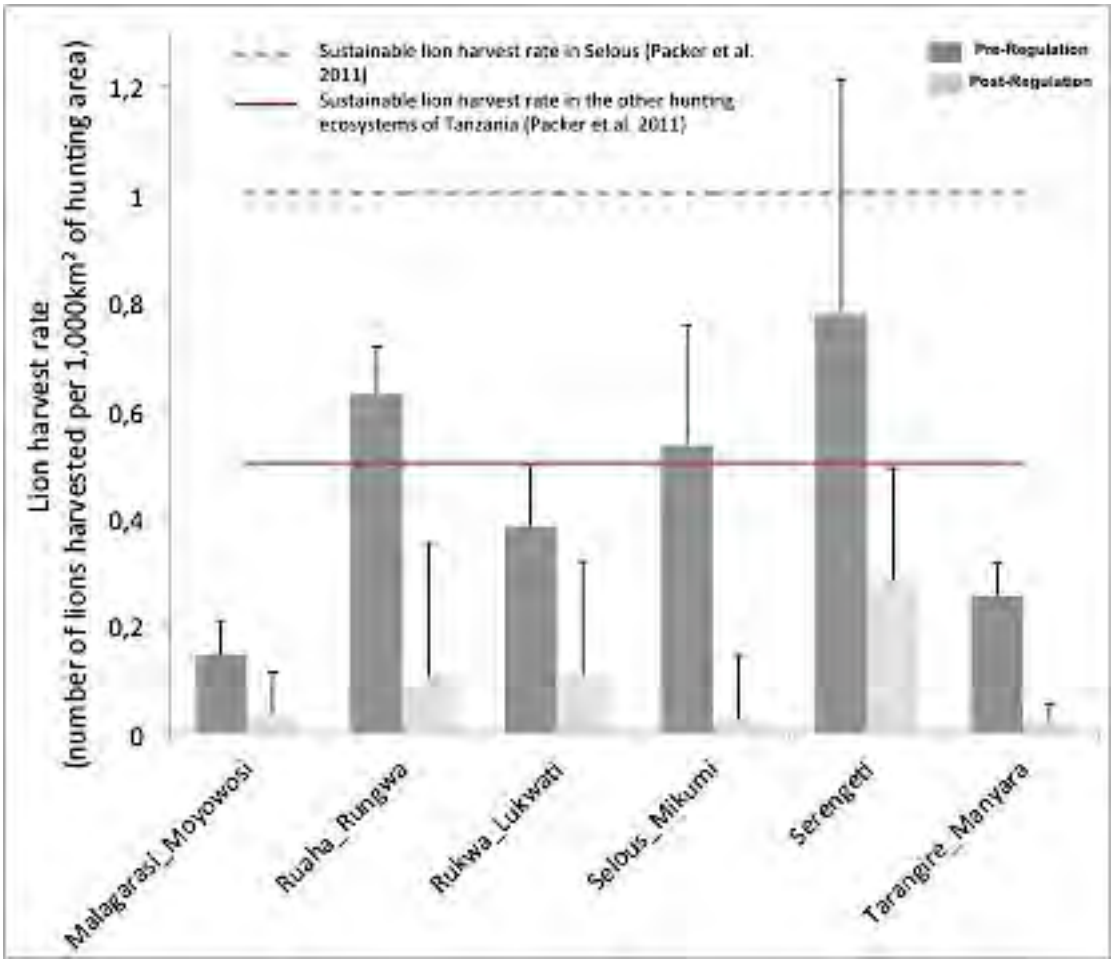


Figure 11: The average lion harvest rates (with standard deviations) across the main ecosystems of the lion range in Tanzania, displayed for two periods, prior 2011, i.e. before the Tourist Hunting Regulations of 2010, and post 2010, i.e. after the Tourist Hunting Regulations of 2010.

Generally, in most ecosystems, harvest rates have declined since 2007, though not continuously (Figure 14). In almost every ecosystem, there was an apparent drastic decline in harvest rates around the year 2011, as the Tourist Hunting Regulations of 2010 started to be implemented.

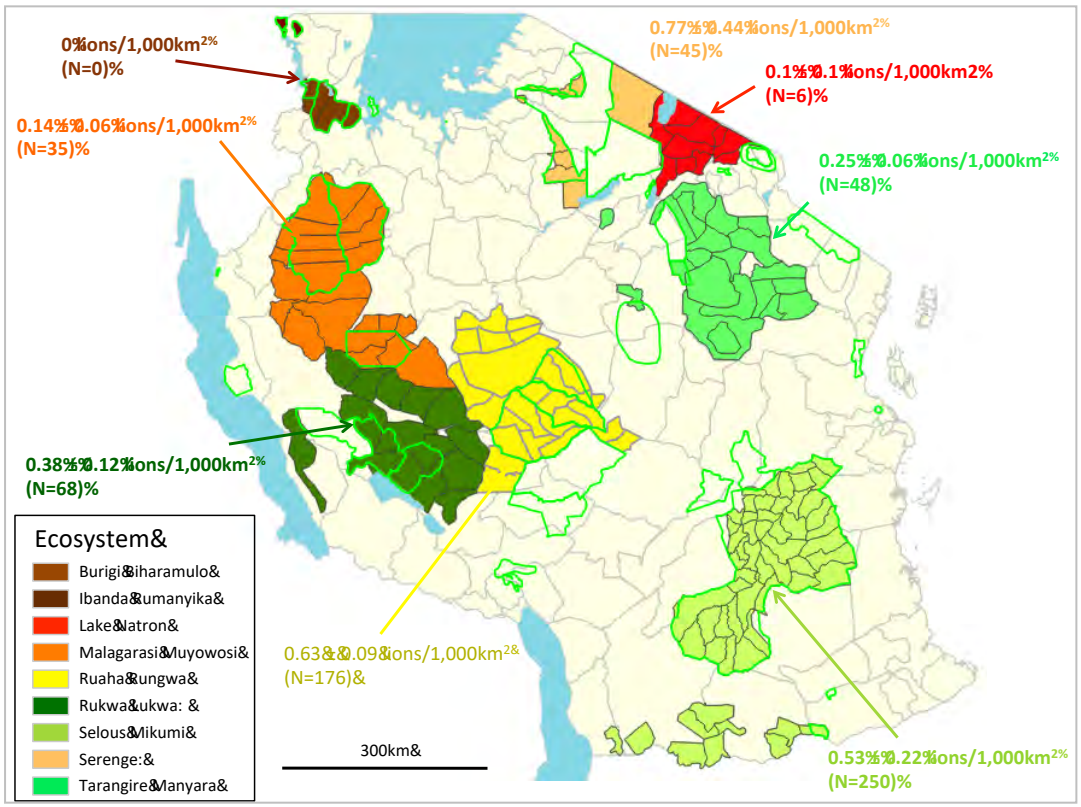


Figure 12: Map of the average harvest rates between 2007 and 2011 across Tanzania.

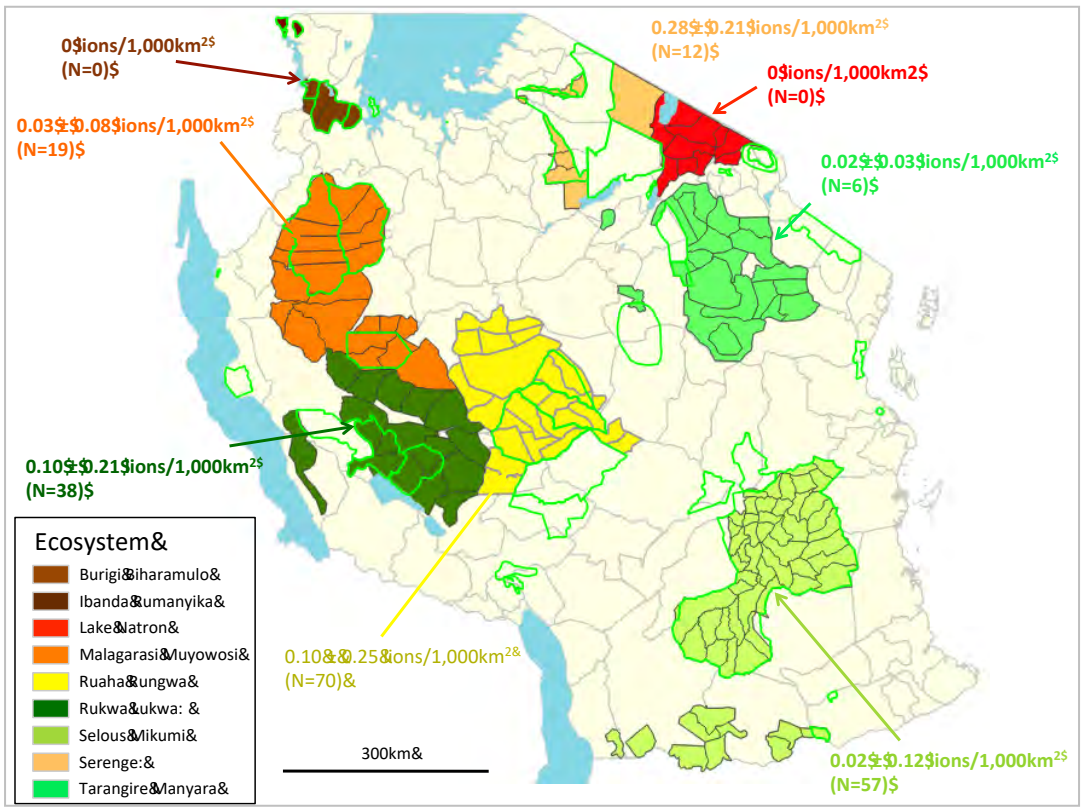


Figure 13: Map of the average harvest rates between 2011 and 2016 across Tanzania.

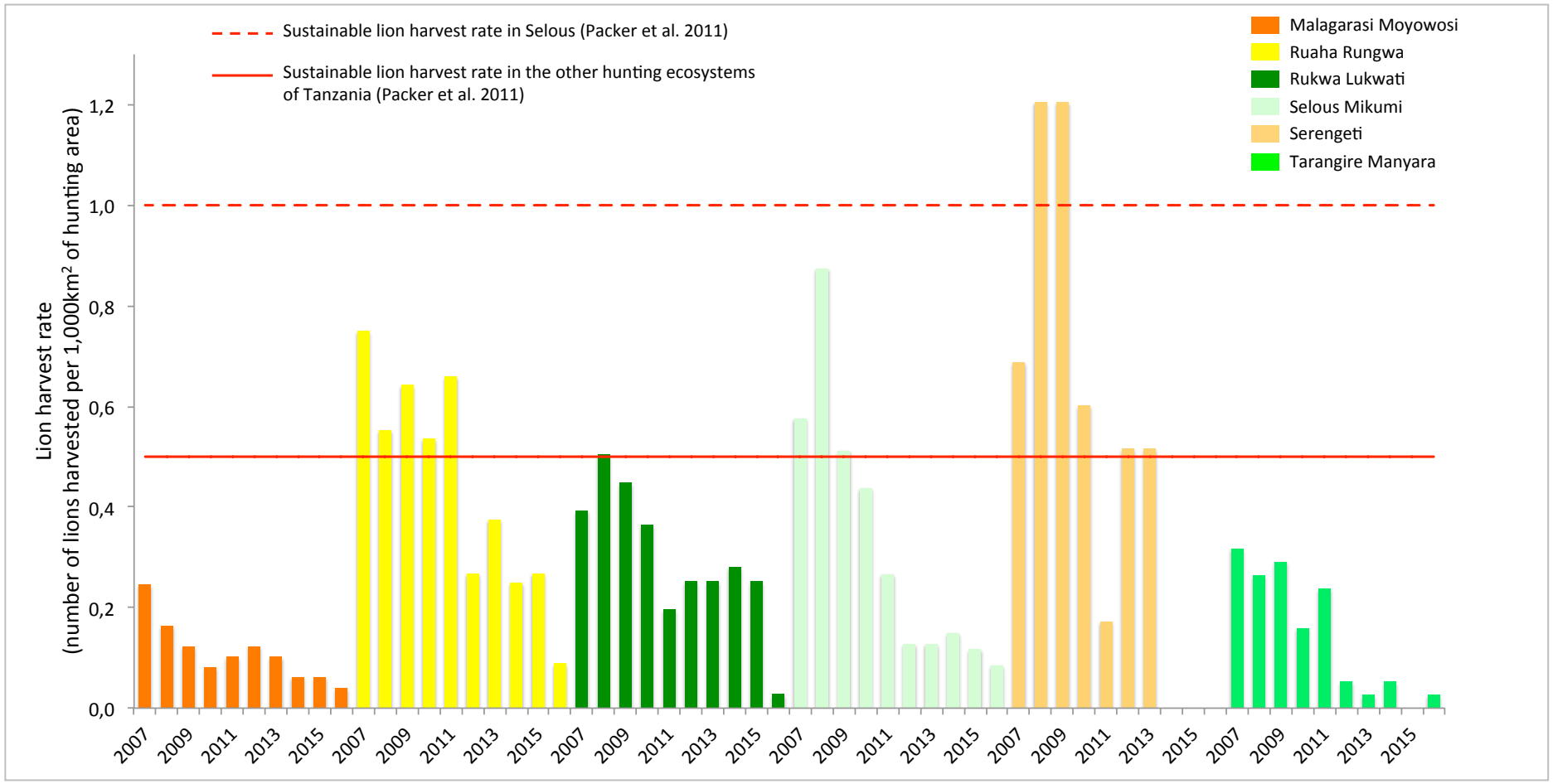


Figure 14: Regional harvest rates in the main ecosystems of lion range in Tanzania since the 2007 hunting season.

Since the introduction of the Tourist Hunting Regulations in 2010, and the adoption of the 6 years of age approach, Tanzania has accomplished tremendous progress in the management of lion trophy hunting:

- The legal framework of lion trophy hunting has been amended, and progressively implemented;
- A nation-wide mechanism has been designed and put in place to inspect all the lion trophies before export every year;
- The public/private partnership has been consolidated, i.e. 100% of the hunting companied have complied with the lion trophy inspection;

The sustainability of lion trophy hunting has been dramatically improved:

- The quotas have been reduced by ca. 50%;
- The number of lions harvested has been reduced by 81%;
- The harvest rates, both at national and regional scales, have reached levels under the threshold of sustainability, i.e. below 1 lion/1,000km2 of hunting areas in the Selous Game Reserve, and 0.5 lions/1,000km2 of hunting area for the rest of the country (Packer et al. 2011);
- The proportion of harvested lions of six years old and more has increased by 88%.

Tanzania's Tourist Hunting Regulations limit acceptable lion trophies to those ages 5 and above, and penalize any professional hunter and client who take a lion under age 5.

The success of the lion aging provisions of the Tourist Hunting Regulations, is due mainly to the involvement and commitment of the hunting sector of Tanzania and its associations (TAHOA and TPHA). Most hunting companies and professional hunters have drastically changed of attitude, as they are consequently very concerned not to harvest an under-age lion.

Since 2011, every single lion trophy harvested by hunters in Tanzania has been inspected by the Wildlife Division (i.e. 100%).

However, this is probably not the only factor. Indeed, in the past years, the growing concern of the international community about the conservation status of the African lion and the management of lion trophy hunting, has not only increased the pressure on the African lion range countries, but also on clients, to mention a few examples:

- The listing of lion under the US Fish and Wildlife Service Endangered Species Act, and the inherent complications for US clients to import their trophy back home;
- The strong opposition to lion trophy hunting by anti-hunting lobbies, and the associated public shaming in the social networks and medias;
- The decision of major airlines and freight companies to stop shipping Africa big five trophies.

This, in addition of the risk to get their trophy confiscated if under-age, may have gradually discouraged clients to book for 21-day safaris packages in Tanzania since 2010, with an important economic loss to Tanzania.

Because diagnosing the age of lion trophies is not an exact science, it may be subject to some inaccuracy and imprecision. At several occasions in the past years, the Wildlife Division has received appeal letters from a few hunting companies that contested the results of age diagnosis for some lions their clients had harvested. For these cases, the Wildlife Division involved an external committee made of lion experts from Tanzania and other lion range countries to review the results for these contested age diagnoses. At most occasions, the reviewing committee confirmed the initial age diagnosis. At few occasions, it updated the diagnosis to the next upper age category.

While the age diagnosis relies on a comprehensive set of criteria comprising external traits, e.g. mane, nose pigmentation, scares, and internal traits, e.g. teeth erosion, skull sutures, pulp cavity, professional hunters can only rely on external traits, which are not always easy to observe in hunting conditions, and not systematically correlated to internal traits, e.g. some young lions can have a well-developed mane.

In addition, morphological traits may vary with geographical location. Typically, the mane tends to be more developed in lions of the northern ecosystems, e.g. Serengeti, than in lions from the southern ecosystems, e.g. Selous.

This complicates the age diagnosis of lions on the ground, in hunting conditions, and may discourage the professional hunters.

While the offtakes and harvest rates have declined, and have been kept below the sustainable levels both at the national and the regional scales, allocated quotas are still above these sustainable levels;

Because lion population censuses have not been carried out across the vast majority of hunting areas in Tanzania during the recent years, but in the Selous Game Reserve, it is not possible to assess the proportion of the lion population being harvested through trophy hunting in Tanzania. However, with less than ca. 50 lions annually harvested in the past three years, this proportion is believed to be very low.

Tanzania is committed to keep on monitoring lion hunting in Tanzania, and to keep on assessing the impact of the Hunting Regulations of 2015 on the sustainability of lion hunting in Tanzania.

7.2 International trade

All data of international trade in plants and animals, or parts and derivatives of plants and animals included in the Appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), are stored in the CITES Trade Database, which is maintained by the UNEP World Conservation Monitoring Centre (UNEP-WCMC). This database represents the official trade figures in CITES-listed species, as reported by CITES Parties in their annual reports to CITES.

We find that the statement of USFWS ESA Final Rule on Lion (USFWS 2015) on page 80024 is probably and partially incorrect in the part concerning trade data, probably due to misunderstanding of the CITES Trade Database. USFWS wrote: *Tanzania, with one of the largest lion populations (Hamunyela et al. 2013, pp. 29, 283; Riggio et al. 2013, p. 32; Ikanda 2008, p. 4; Baldus 2004, pp. 5, 6), was the largest exporter of wild-origin lion trophies, but their exports have decreased significantly since 2008. In 2008, approximately 138 trophies were exported from Tanzania; in 2010, 128 were exported; in 2011, 55 were exported; in 2012, 62 were exported (it should be noted that in 2012 Tanzania established an annual quota to limit trophy hunting to no more than 50 animals (Jackson 2013, p. 7); and in 2013, 11 were exported (UNEP–WCMC 2014, unpaginated). Again, it should be noted that there may be discrepancies between the annual quota and the actual number of trophies exported in a given year (see http://www.cites.org/common/ resources/TradeDatabaseGuide.pdf for additional information). Regardless, the numbers of lion trophies exported by Tanzania according to the UNEP– WCMC CITES Trade Database suggest a decreasing trend.*

While the export and the harvest have rightly significantly decreased thanks mainly to the age-based provisions, Tanzania has never established a hunting quota in 2012 to limit Safari hunting to no more than 50 animals. Most likely the confusion arises from the fact that the offtake has been 50 animals in 2012 as a result of the implementation of the age based restrictions explained fully in this document and that due to the time associated with trophy preparation and export, CITES trade data do not accurately reflect offtake on a year to year basis.

Further the USFWS used a Gross Export report generated from the CITES trade database as referenced in the Supporting Documents for the Final Rule found at Docket FWS–R9–ES–2012–0025 on the website www.regulations.gov.

It is important to note that, according to the guide to using the CITES Trade Database, Gross and Net Export reports tend to overestimate trade levels. as where different quantities have been reported by the importer and the exporter, the larger quantity is presented in the output. (http://trade.cites.org/cites_trade_guidelines/en-CITES_Trade_Database_Guide.pdf)

It is important that the Comparative Tabulations Report type is used for the trade analysis.

In a comparative tabulation retrieved from the CITES trade database using the trade terms "skins", "trophies" and "skulls" (as Skulls are sometimes traded separately from a skin or a trophy although most of the times the skin and skull of the same lion are shipped together and double counting can occur, see table 6a and6b for example.), and selecting the year range 2010-2015, Tanzania as the country of export, "All countries" for importing countries, "All sources", "All purposes", selecting "skulls", "skins" and "trophies" for trade terms, searching by taxon: Panthera leo, selecting output type "csv", and selecting report type "Comparative Tabulations", the following data were retrieved and are presented in tables6a, 6b and 6c.

Table 6a Export of *Panthera leo* (Trade Term Skulls) 2010 – 2014 *Source: CITES Trade Database- Comparative Tabulation*

App.	Taxon	Term	Unit	Country	2010	2011	2012	2013	2014
II	*Panthera leo*	skulls		TZ	46	5	7	9	0

Table 6b Export of *Panthera leo* (Trade Term Skins) 2010 – 2014

App.	Taxon	Term	Unit	Country	2010	2011	2012	2013	2014
II	*Panthera leo*	skins		TZ	46	6	7	6	1

Table 6c Export of *Panthera leo* (Trade Term Trophies) 2010 – 2014

App.	Taxon	Term	Unit	Country	2010	2011	2012	2013	2014
II	*Panthera leo*	trophies		TZ	20	6	10	3	39

Other exports recorded in Tanzania include parts and derivatives such as specimens for scientific purposes. (CITES trade database). Note that due to the time associated with trophy preparation and export, CITES trade data do not accurately reflect offtake on a year to year basis. As such, lions reported in international trade are not necessarily from Lions harvested in the same year they are exported as international trade may be from harvests in many different hunting seasons which can date back several years.

In any case Tanzania is fully convinced of the correctness of its lion harvest data as reported in Table 5 and will explore with UNEP-WCMC and interested Parties methods to mutually improve CITES Trade Data.

As the quantities reported from the importing countries in some cases and years differs from the quantities reported by Tanzania and in order to improve consistency with the standard procedure adopted by CITES, Tanzania would like to facilitate verification of CITES permits issued, in the following ways:

- Parties should be requested to verify the authenticity of CITES documentation issued by Tanzania through a request for verification of CITES documentation to the CITES Management Authority of Tanzania;
- The CITES Management Authority of Tanzania will provide information to allow permit verification (e.g., provide a copy of the permit or certificate as issued, or verify a copy of the document provided by the importing country); and
- The CITES Management Authority of Tanzania will provide information within 15 business days of the request for verification. If this is impossible, the CITES

Management Authority of Tanzania shall reply within 15 business days and indicate a date by which they consider it will be possible to provide the information requested.

The above illustrated procedure will be communicated to the CITES Secretariat requesting the issuance of a Notification to the Parties.

The level of illegal use of lion parts in Tanzania is currently unknown, and there has so far been no evidence to suggest that it may be a driver for the poaching of lions. Impacts of trade in lion bones and other body parts is recognized as being potentially detrimental to wild lion populations (Williams et al. 2015.), although the bulk of the trade originating from South Africa is from captive-bred specimens. One of the few cases in possession of the Wildlife Division is represented by the arrest, at Dar-es-Salaam airport in 2009, of 4 people trying to smuggle ivory to China in a suitcase that contained also 60 Lion claws and teeth.

8. Lion Management

African lion conservation in Tanzania is implemented through a number of government agencies, under the Ministry of Natural Resources and Tourism. The Director of Wildlife coordinates the activities within the Wildlife Division and other agency such as the TANAPA agencies, Ngorongoro Conservation Area Authority (NCAA), TAWIRI, and at District level through the Tanzania Carnivore Action Plan (2009).

8.1 Management Plans

The Carnivore Action plan published by TAWIRI in 2009 includes an Action Plan for the African Lion and Leopard. (ANNEX 3).

This was the result of the Tanzanian Lion and Leopard Conservation Action Plan Workshop that was held 20th-22nd February 2006 at the Tanzania Wildlife Research Institute (TAWIRI) headquarters in Arusha. The workshop brought together stakeholders to assess existing information and set priorities for conservation of lion *Panthera leo* and leopard *Panthera pardus* in Tanzania. The workshop was attended by 17 participants from TAWIRI, Wildlife Division (WD), Tanzania National Parks (TANAPA), Ngorongoro Conservation Area Authority (NCAA), Forestry and Beekeeping Division (FBD) together with a representative from the hunting community and lion and leopard experts.

The representation of the institutional stakeholders responsible for lion management is nowadays the same with the exception of the Forestry and Beekeeping Division (FBD) of the Ministry of Natural Resources and Tourism that in 2011 was transformed into the actual Tanzania Forest Services (TFS) Agency. http://www.tfs.go.tz.

Since the publication of the Lion and Leopard Action Plan, TAWIRI has implemented it through continued long term monitoring of lion populations in several key areas. Also several surveys were done as indicated on table 1.

Furthermore, it is continuously following issues related to human-lion conflict through several ongoing conflict-mitigation activities. TAWIRI Veterinary Service Unit continues to survey and collate information on diseases of lions and other carnivores. There have been efforts to ascertain and map the entirety of the lion range in Tanzania in order to determine the extent which is protected.

Also as part of implementation of the Action Plan, the Wildlife Division since 2009 is collaborating through a Memorandum of Understanding with the International Foundation for the Management of Wildlife (IGF Foundation). This has resulted in several important achievements in lion conservation such as the 2010 Lion Status report (Mésochina et al. 2010), the lion hunting monitoring system of which the age restriction system is an important component and surveys performed by TAWIRI in collaboration with IGF.

Specific implementation activities on the Lion and Leopard Action plan includes:

Management: The Management and Scientific Authorities have 1) made a countrywide status assessment which has established the extent of the lion range, population size and overall threats (Mésochina et al., 2010). 2); maintained population monitoring of trends in key lion populations (Selous, Serengeti, Ngorongoro and Tarangire); 3) conducted three major population surveys of key lion hotspots (Selous (hunting areas), Rungwa (hunting area), and the Maasai Steppe (Human-lion conflict hotspot); and4) conducted a census of the West Kilimanjaro trans-boundary lion population in conjunction with Kenya Wildlife Authorities.

Mitigation: The Management and Scientific Authorities have i) established a consolation scheme through the Dangerous Animals Damage Consolation Regulations 2011(see section 9.1); and ii) established research priorities and research projects supported by Conservation NGOs to address human-lion conflict among pastoralist communities. This is demographic segment of the human population the most affected by lion damages in Tanzania. These projects aim at improving husbandry practices through enhanced protection of livestock at the bomas and herding. Projects involve communities in the high human-lion conflict regions of Maasai Steppe, Ngorongoro Conservation Area, Ruaha-Rungwa landscape and Rukwa-Katavi ecosystem (see section 4.1).

Socio-economics: The Management Authority has established a system of socio-economic benefits to local communities living with wildlife, including lions. The WD division disburses 25% of hunting fee revenue (including hunted lions) back to District Councils (see section 10). TANAPA has increased its Community Based Conservation programmes which foster development projects in villages surrounding National Parks. Hunting companies have offered substantial support for development in rural communities (see Table 2). Photographic tourism's contribution to conservation is also important and figures and projections are maintained mainly by TANAPA.

Policy and land-use: The Management Authority continued with the establishment of WMAs in order to foster lion conservation at the human-lion interface.

Trade: Management Authority continued with the sustainable utilization of lions through safari hunting. Major amendments have been made to Hunting Regulations (2010 then 2015) for greater sustainability. The sustainable harvest rate has been determined for lions and a pioneering Trophy-Monitoring Programme has been established and is implemented by the Wildlife Division.

The Ministry of Natural Resources and Tourism through its Wildlife Division, depending on the availability of funding, would like to gather the institutional stakeholders which have a responsibility on lion management, in order to update the plan and make it specific for Lion, also in accordance with recent developments in legislations, regulations and strategies on wildlife conservation in Tanzania. The WD is actively looking for donor support for the project.

9. Threats

9.1 Human-lion conflict

In Tanzania, the main source of illegal killing of lions originates from Human-Lion conflict. (Figure 15)

In Tanzania, the human population has significantly increased since 1950 (i.e. 7 million in 1950 against 46 million in 2011) and is projected to increase by 500 per cent or more by 2100 (United Nations 2011). During 2011-2100, six countries are expected to account for half of the world's projected population increase, Tanzania being among them (United Nations 2011). As a result, there is considerable pressure to convert land to agro-pastoral production, and the pressure is expected to increase tremendously, given the above-mentioned projections from the United Nations.

Human-lion conflict occurs when lions become problematic to local communities by threatening, and or attacking human beings and property such as livestock. This year close to 10 attacks occurred on humans and 150+ on livestock (cattle, goats, sheep, dogs etc.) were killed.

Retaliation for these livestock losses is done through spearing, poisoning and ritual hunting.

Although it is impossible to give an exact estimate of how many lions are killed in retaliation of livestock damages or human killings, they should account for a number possibly between 100 and 200 lions. (Ikanda *pers.comm.*). This mainly occurs within pastoral communities which rely on livestock for their livelihoods and indiscriminate killings of lions poses the most significant threat to the species. It is not only a major concern for lion conservation, because it triggers retaliatory killing of lions for attacks on livestock, but especially for human security and lives.

During the past years, simply at the eastern border of Tarangire National Park, large carnivores have carried out approximately 50 attacks on livestock per community each year. Retaliation against livestock depredation killed 6–7 lions per community per year on the Maasai Steppe. This equated to an annual loss of 72–84 lions across 12 communities (Lichtenfeld 2005; Kissui 2008).

Lion attacks on humans are especially high in central and southern Tanzania. Here close to 10 attacks occur annually, but have gone up to over 100 in some years. Between 1990 and 2004, lions killed at least 563 people and injured more than 308. (Packer et al. 2005; Species Survival Commission Cat Specialist Group 2006; Ikanda 2007, Packer et al 2007). The total number of attacks, updated to 2015 has been estimated to more than 1,050 with the majority among the poorer rural people. (Ikanda, pers.comm.). This tremendous loss of human lives puts a major responsibility over the wildlife authorities.

In accordance with the Wildlife Act of 2009 when a lion attacks a human it shall be eliminated and most attack results in lions being killed in problem-animal control. Although the killings are largely controlled, the sheer number of attack incidences can lead to a significant number of killings. Less than 10 lions are killed through official “problem animal control” (PAC) for this reason per year (WD data).

There are various options for human/lion conflict management and how they might be perceived by stakeholders. In this regard Chardonnet et al. (2010) wrote the following and a table (Table 7) that contains some major points:

Prevention of conflict is the key to coexistence. Land-use planning to ensure that human activities are not carried out in wildlife protection areas helps to prevent human/lion conflict; there is also a need for community awareness about behavior, triggers for lion conflict, animal husbandry and planning. Incentives are often needed: a promising approach is to establish innovative insurance schemes supporting best practices. Protection of people and livestock from lions, for example with bomas and wise use of pastoral rangeland is a second strategy. Livestock areas should be selected with regard to wild habitat, and buffer areas should be established between them and carnivore areas. Mitigation by ensuring that people perceive the lions more positively can be applied in cases where human/lion conflict is common. Interest in the benefits generated by lions will increase tolerance; in areas with little photographic tourism, trophy hunting could generate income and give people a sense that the lion population is being controlled.

Table 7 Synthesis of management options. Efficiency, costs and durability are graded from 1 to 4 by increasing value of each variable. Perception is graded as: P = poor, N = neutral, G = good, I = needs incentive, D = donor dependent, S = institutional/commercial support, C = requires community involvement, E = ethical or conservation issues. (From: Chardonnet et al.2010)

Management option	Efficiency	Cost	Durability	Perception
HUMAN MANAGEMENT				
Community awareness	4	2	4	N/S,C
Compensation				
Direct compensation: subsidies and insurance	3	3	3	P,N/I,D,S
Indirect compensation: wildlife valuation	4	3	4	G/D,S,C
LIVESTOCK MANAGEMENT				
Intensifying human vigilance	3	1	2	P,N/I
Livestock guarding animals	4	2	3	N/I
Use of enclosures	4	2,3	3,4	N,G/I
Grazing and herd management	4	1	4	N,G/I
LION MANAGEMENT				
Non-lethal				
Deterrent methods	1,2	2,4	1	P,N/I,D
Translocation of lions	1,2	4	1	P/D,I
Contraception	1	4	1	P/D,E
Lethal				
Off-take by the administration	2	2,3	3,4	P,N/E
Off-take by populations, farmers and breeders	4	1,2	3,4	G/C,E
Off-take by trophy hunters	1	1	3	N,G/I,D,E
ENVIRONMENTAL MANAGEMENT				
Increase alternative prey	3	1	4	N,G
Land use planning				
Planning/manipulating wildlife and village distribution	2,3	3	2,3	P,N/I,O,S,C
Zoning round protected areas	4	3	3,4	N,G/I,S,C

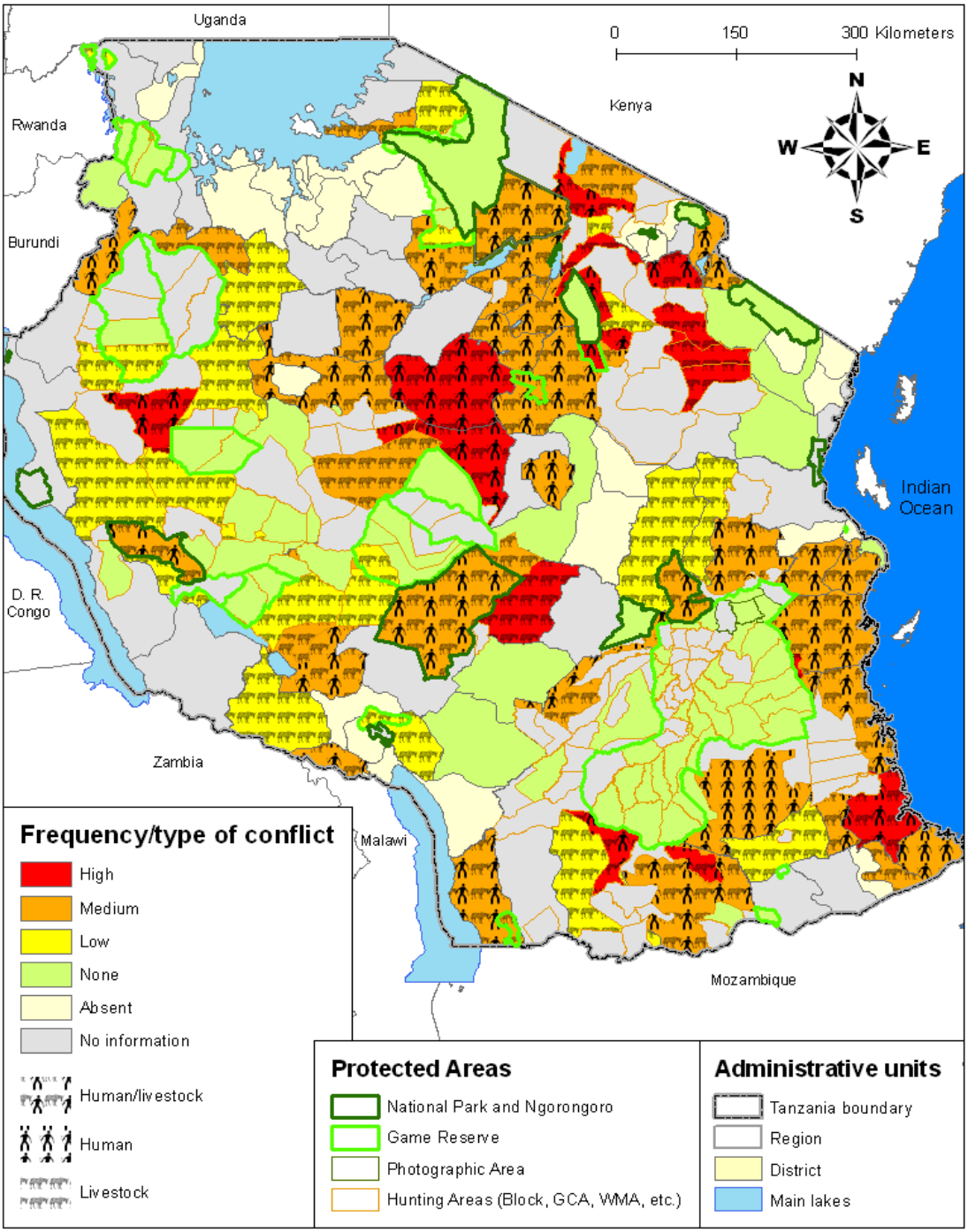


Figure 15: Frequency and type of human/lion conflicts in Tanzania (by January 2010). Absent: lion presence not recorded in the area; None: conflict presence not recorded in the area; Low: conflicts reported once or twice without human death; Medium: conflicts reported every year and/or with at least one human death; High: conflicts reported several times per year and with human casualties and/or a high number of livestock losses. (from Mésochina et al.2010)

As referred in section 8.1, Tanzania established a mitigation scheme for lions and other wildlife species through the Dangerous Animals Damage Consolation Regulations 2011 (Annex 4). This scheme is applied in the entire country where people affected by the loss of relatives and livestock to lions and other wildlife species are consoled through payment-in-kind. The scheme aims to increase human tolerance for lions, hence reduce the number of indiscriminate killings at the human-lion interface.

Wild lion populations outside national parks only have a future if rural people see a direct benefit of coexisting with them. The revenue from official and controlled hunting encourages the lion range states to leave hunting blocks as wilderness areas and refrain from converting them into pastoral rangeland and agricultural land with the associated loss of biodiversity. Together with elephants, lions are the most valuable trophy hunting species and to remove them from the quota would render trophy hunting in many areas less economic or not economic at all. Banning lion trophy hunting or creating international trade barriers for hunters to take home legally obtained trophies removes the economic as well as the management and law enforcement incentives that are necessary for conservation. (Baldus and Michel 2011)

Furthermore, mitigation programs such as the one initiated by Lion Guardians, are aimed at promoting coexistence between lions and local communities, a formidable challenge in a country where lion range covers more than half of a nation experiencing rapid human population growth.

9.2 Habitat loss

Tanzania is the only country which still has a large population of lions outside of gazetted protected areas. The lion is there by virtue of the fact that as a species it is protected wherever it should occur. Nevertheless, this portion of habitat is now increasingly subject to rural population expansion which inevitably leads to the lions and other wildlife being pushed back towards the protected areas which adjoins these marginal lands.

The second biggest potential long-term threat to the Tanzania lion population, after retaliatory killings, is the potential and real loss of habitat and the fragmentation of range through the interruption of access routes and conflicts with people in the absence of effective incentive mechanisms to maintain such habitat. Lions, through their negative impacts on livestock, can easily be excluded from large parts of Tanzania outside protected areas. Without a way of benefiting from lions, lions are regarded as a liability and economic cost to rural communities, who suffer livestock losses and lose human lives to lions. The most effective strategy to prevent this displacement is to integrate lions into rural economies as assets and to demonstrate that lions contribute to the welfare and development of people. The involvement and empowerment of rural people in natural resource management, in combination with economic and financial incentives through sustainable use, and linked with skills development and capacity building, are the main driving forces behind changes in attitudes towards wildlife in communities that owns livestock but not wildlife. This strategy has the ultimate goal of conserving habitats.

Habitat loss can be exacerbated by a decrease in overall revenues from safari hunting; the lack of incentives for safari operators due to international campaigns or decisions by importing countries have the potential to decrease the investments in habitat protection done by the hunting sector, and decrease tolerance of rural communities toward lions with habitat.

Although habitat and range of lions has been documented to be decreasing in a number of lion range countries (Henschel et al., 2010; Riggio et al., 2012), the situation in Tanzania remains different due to substantial conservation measures which have been put in place to secure and ensure continued protection of wilderness areas, most of which harbour lions (Mésochina et al., 2010). However, as noted it the previous paragraphs, there are increasing and potential pressures on habitat as marginal lands are village lands and consequently suffer from rural population expansion through establishment of settlements and agricultural activity. This human encroachment is spreading around and over natural habitats, and is potentially exposing more and more human populations to lions.

Importantly sport hunting is playing and can play an important role in the general framework of management of protected areas to prevent them being abandoned or converted to agriculture and to find ways to improve the lives of people living with wildlife. These habitats are critically important for lion conservation and ecotourism is not a viable alternative in many of them. Tanzania is looking at solutions and best practice guidelines for securing wildlife (including lion)

landscapes and habitats and prioritizing its conservation efforts.

9.3 Poaching

Poaching of lions (not to be confused with retaliatory killings) is recorded in very low numbers in Tanzania (10-20/year). Records mainly come through from anti-poaching records of Wildlife Management Authorities that result from impoundment of body derivatives such as skins, teeth/claws, body fats and bones. These may be sought after for local traditional medicinal use. Poaching mainly occurs outside the Protected Areas (PAs) network, but lions along PAs' boundaries and margins are also incidentally snared as non-target prey.

In general, Tanzania has developed a National Anti-Poaching Strategy that provides an effective program of support to combat poaching and illegal wildlife trafficking in Tanzania through a three-pronged approach: (i) Strengthening law enforcement through investing in capacity building to strengthen law enforcement, establish and maintain national cross- agency mechanisms and streamlining cross-border and regional cooperation through better coordination (ii) Increase capacity of local communities to pursue sustainable livelihood opportunities and eradicate poverty iii) raising awareness in supply, transit and destination countries to help change attitudes towards wildlife crime and building international support. (MNRT 2014).

Furthermore, as a member of the Southern African Development Community (SADC), Tanzania is implementing the SADC Law Enforcement and Anti-Poaching Strategy (SADC 2015), approved by the SADC Ministers responsible for Environment and Natural Resources on 6th November 2015. This strategy will complement the National strategy and will provide, inter alia, for stronger regional cooperation on the issues pertaining to illegal use and trade of wildlife.

9.4 Bushmeat Poaching and Prey Abundance

Poverty stands as the major driver of illegal hunting as households vie for income and sustenance. Livelihoods of illegal hunters have been augmented considerably through revenue generated from bushmeat sales. Illegal hunters use bushmeat both for supplementing household protein and for economic gain. (Knapp,2012)

Poaching for bushmeat is an important livelihood component of rural communities in Tanzania and a vast literature exists on this subject (among others, specific to Tanzania: Ceppi et al. 2014, Knapp 2012, Loibooki et al., 2002, Martin and Caro 2013, Mfunda et al. 2010, Nielsen at al. 2014, Ndibalema and Songorwa 2008, More general: Lindsey et al 2015a and 2015b).

Poaching for bushmeat does not seem to have observably impacted the overall lion's status in Tanzania, but more research is needed to fully understand its impact on lion.

The extent to which bushmeat poaching is depleting lion's prey is not completely known.

Prey abundance is still high in several Tanzanian Ecosystems. As abundance of prey species is highly correlated with lion density (Hayward et al 2007) and as Lions exhibit a strong preference for larger bodied prey including African buffalo, *Syncerus caffer*, (Hayward & Kerley, 2005), data on the main prey species for lion, extracted from TAWIRI aerial surveys reports of 2014 and 2015, are shown in Figures 16 to 20 below.

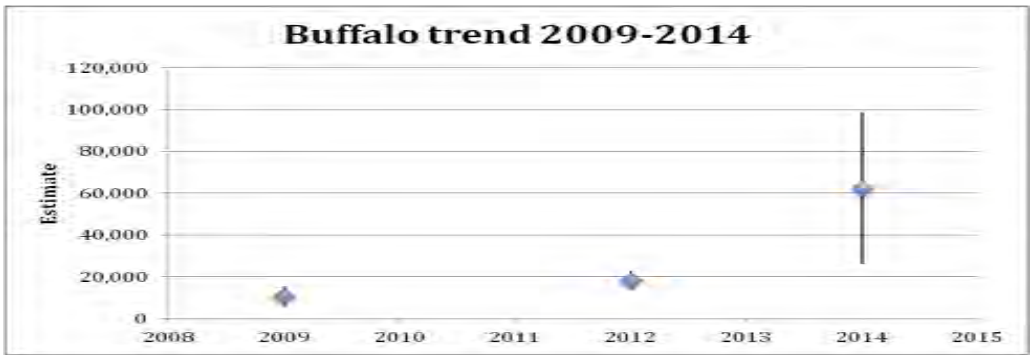
The figures for Ruaha-Rungwa needs to be interpreted cautiously as the quality of surveys prior to 2009 was not optimal. In this ecosystem during the period 2009 -2015 the buffalo population increased while the zebra population remained stable or had a slight decrease.

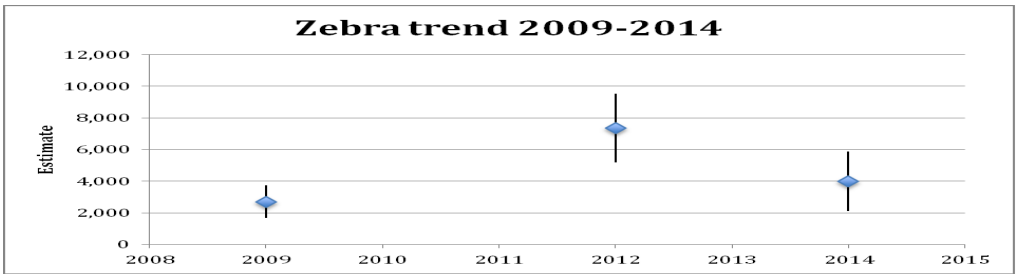
Figure 16 Ungulates estimates in the Selous-Mikumi Ecosystem 2009 and 2014

Year of Survey	2009		2014		5-year trend
Surveyed Area	80,390 km2	SE	88,166 km2	SE	
Species name	Estimates		Estimates		
Buffalo	41,493	9,631	78,231	14,122	+ Increase
Hippo	11,333	2,247	23,756	5,503	+ Increase
Puku	6,780	2,269	3,055	899	- decrease
Impala	19,204	3,461	23,677	4,198	+ Increase
Zebra	12,763	1,832	16,240	2,391	+ Increase
Duiker	2,992	702	5,984	550	+ Increase
Eland	2,056	507	5,488	1,359	+ Increase
Giraffe	1,202	387	3,155	1,877	+ Increase
Greater Kudu	78	45	927	255	+ Increase
Hartebeest	10,677	3,860	21,672	2,710	+ Increase
Sable antelope	2,277	833	4,885	985	+ Increase
Warthog	2,979	485	7,691	733	+ Increase
Waterbuck	3,444	753	5,003	1,459	+ Increase
Wildebeest	20,591	5,066	16,939	5,131	Stable?

Source: TAWIRI 2015

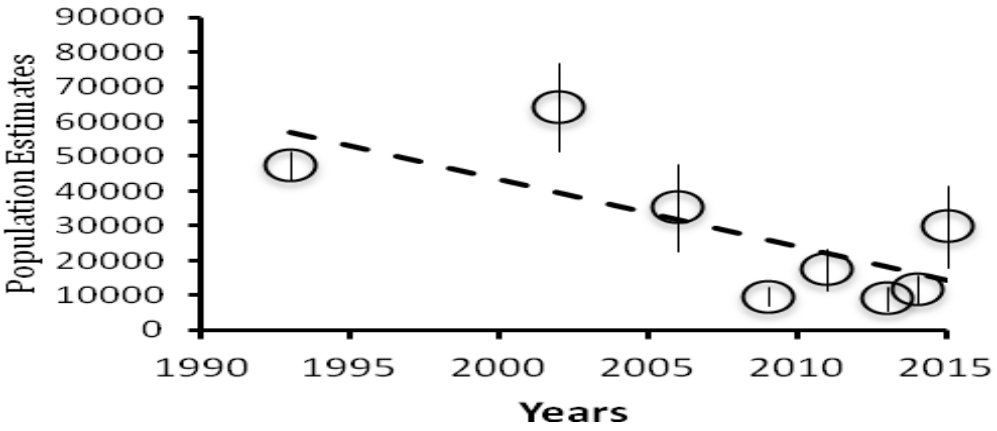
Figure 17 Buffalo and Zebra trends in Katavi-Rukva Ecosystem





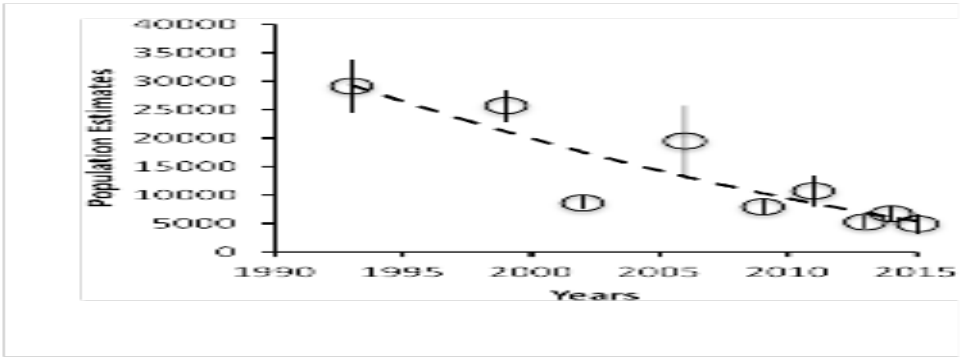
Source: TAWIRI 2015

Figure 18 Buffalo Population Trend Ruaha-Rungwa Ecosystem



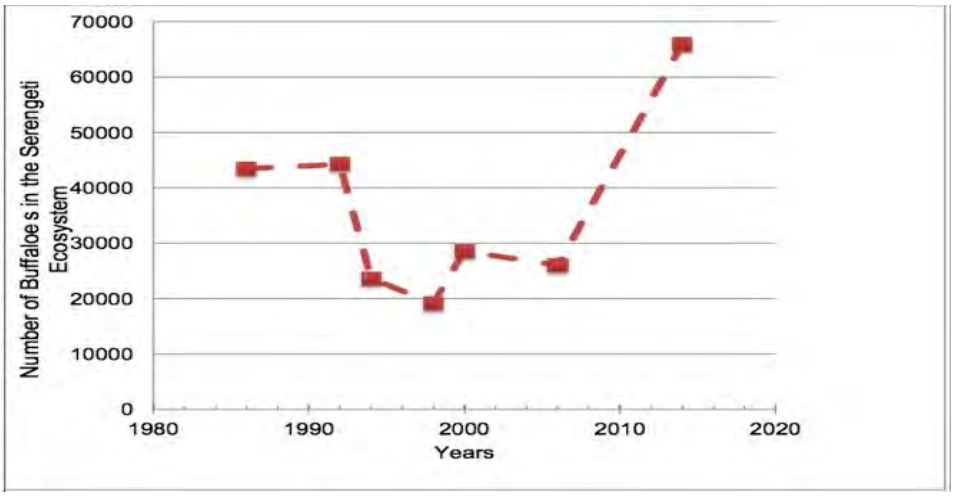
Source: TAWIRI 2015

Figure 19 Zebra Population Trend Ruaha-Rungwa Ecosystem



Source: TAWIRI 2015

Figure 20 Buffalo population trend in the Serengeti Ecosystem



Source: TAWIRI 2015

10. Community partnership, benefit and participation

10.1 Overview

Tanzania firmly believes that wildlife conservation cannot be achieved without taking into account the human dimension which is attached to it. Poverty remains the first and foremost cause of poaching in Tanzania and in the rest of Africa, where nearly 50% of the population live on slightly more than one US dollar a day. Tanzania recently improved its policy on community benefits sharing in hunting and photo tourism fees and governance of the wildlife sector by local communities to achieve poverty reduction through legal and sustainable wildlife utilization.

Tanzania shares with other countries in the region the view that, community-based initiatives and policies must be given the support they need to deliver incomes to local people through legal, regulated wildlife utilization, incomes that are crucial in alleviating poverty. This support shall include the right for local communities to be consulted as equal partners in wildlife conservation. The consequences of ignoring or failing to encourage such community operations, in social contexts steeped in poverty, is well established. Poaching increases, often with the same local people recruited into poaching gangs, by organized criminal syndicates. Community-based natural resource programs are one of the most crucial and important part of the solution to the poaching and illegal trade in wildlife.

An exclusively biological focus on the sustainability of wildlife harvesting and trade can never guarantee sustainable use of any species, in fact it tragically refuses a critical tenet of sustainability as a principle, which requires, in its applications, an ecosystem scale of assessment, in which the social systems with their cultural, economic and political dimensions are embedded. The same applies to an exclusive focus on species rather than to the human and social dimensions of conservation.

Tanzania has been implementing Wildlife Management Areas since 1998, to varying degrees of effectiveness. The regulations governing WMAs were amended several times, and national Wildlife Conservation Act was ultimately revised to more completely devolve authority to the local communities who live side-by-side with wildlife. Under this Act, these communities are better able to benefit from wildlife use (consumptive or non-consumptive). Part V (and especially Section 31) of the Act provides guidance of the establishment and management of the WMAs, and specifically on the legal requirement for benefits sharing between operators, Tanzania's government and communities through WMAs.

The regulations governing WMAs were revised in 2012 to improve benefits sharing in keeping with the policy objectives of the Wildlife Conservation Act of 2009.

In general WMAs are key aspect in fighting poverty through wildlife utilization. If wildlife is seen as an asset and not a nuisance to rural people of Tanzania, they will greatly contribute to its conservation and not to its destruction. The potential of WMAs is enormous to conserve natural resources outside protected areas through consumptive and non-consumptive tourism or other forms of development. In brief WMAs represent the community based conservation system of Tanzania and they are seen as a key component of rural development and as one of the best weapons in the fight against illegal utilization.

Table 9 provides an overview of the revenue sharing generated from safari hunting in WMAs that was in place until July 2015. Of the other lesser fees (game fees, observer fees, conservation fees), the WMA gets 45% while the rest is divided between Wildlife Division, Treasury, and District Council.

Table 9: Revenue sharing generated from safari hunting in Wildlife Management Areas (up to July 2015)

No.	Type of fee	TWPF	WMA	DC	TR
1.	Block fee	25%	75%	0	0
2.	Game fee	25%	45%	15%	15%

3.	Conservation fee	25%	45%	0	30%
4.	Observers fee	25%	45%	0	30
5.	Permit fee	25%	15%	0	60%

TWPF-Tanzania Wildlife Protection Fund, WMA-Wildlife Management Area, DC-District Council, TR-Treasury

The table above shows the situation up to July 2015.

During a Workshop held in Arusha 2nd and 3rd July 2015 the Minister of Natural Resources and Tourism ordered urgent review of the benefit sharing arrangement. Table10 shows the new arrangement for benefit sharing of Safari hunting revenue in the Wildlife Management Areas

Table 10: New proposed revenue sharing generated from safari hunting in Wildlife Management Areas

No.	Type of fee	TWPF	WMA	Change in % to WMAs	DC	TR
1.	Block fee	25%	75%	No Change	0%	0%
2.	Game fee	25%	65%	+20%	10%	0%
3.	Conservation fee	25%	70%	+25%	5%	0%
4.	Observers fee	25%	70%	+25%	5%	0%
5.	Permit fee	25%	70%	+55%	5%	0%

Therefore, the above arrangement replaces Twelfth schedule of the current WMAs Regulations (2012) and they are already in operation pending forthcoming revision of the WMA Regulations, which is in progress and should be published soon.

This ground-breaking initiative places Tanzania right after Namibia in terms of the percentage of revenue sharing in favor of local rural communities in Africa. That is an impressive place to be. It is also an important step towards a full "devolution of authority to local communities" in the context of wildlife and natural resource management on which the Government of Tanzania has formed a national Task Force to analyze institutional arrangements needed to aim at the 100% of revenue sharing as in the Namibian CBRNM framework.

During the above mentioned workshop, other deliberations were taken which include the followings:

- ✓ Review of the WMA Regulations (2012) in order to improve governance in the WMAs. The review included, among other things, the benefits sharing schemes among MNRT, WMA, District Councils, and Treasury. The quick entry into force of this reviewed regulations is of critical importance.
- ✓ MNRT to continue with revenue collection but with improved disbursement to WMA stakeholders in order to avoid delays in disbursement upon payment of relevant fees through the electronic payment system.
- ✓ Review of the Non-Consumptive Regulations (2008) on benefit sharing schemes.
- ✓ Holding of a joint WMA stakeholders meeting annually in order to review progress made and challenges to WMA management.
- ✓ Building capacity of WMAsin many aspects including governance issues, but stakeholders need to agree on what capacity component need to improved.

Therefore, the underlined part of the statement contained in page 80011 of the USFWS ESA Final Rule on Lion (USFWS 2015) is incorrect: *Furthermore, many communities lack the rights over land and in most cases in Botswana, Tanzania, Zambia, and Zimbabwe, the government retains a significant portion of revenue from wildlife; therefore, those that bear the costs of wildlife do not receive benefits, and bushmeat hunting is the only way to benefit from wildlife (Lindsey et al. 2013b, p. 88).*

On the first part of the above-mentioned USFWS statement i.e. "*Furthermore, many communities lack the rights over land"*, we would like to remark that WMAs that are operational

have obtained User Rights in Accordance with the WMA Regulation 2012. Therefore, the statement is incorrect.

As suggested by Kiffner et al. (2016) the key to successful wildlife conservation appears to be protection from (illegal) hunting and increasing people's tolerance of wildlife (among others: Kinnaird & O'Brien, 2012).

Moreover, we would like to add that in May 2014 MNRT announced a joint MNRT – Ministry of Local Government Task Force to better define "devolution of authority to local communities" in the context of wildlife and natural resource management and conservation at the community level. The Task Force will provide indications on ways to improve governance and coordination of all wildlife and natural resource conservation efforts at the district level through clear lines of duties and responsibilities among relevant district/ward/village institutions. This was further discussed during the conservation partners meeting held in September 2014. The process is continuing and is being developed by both MNRT and the Ministry of Local Government.

Table 11 is a partial summary of hunting revenues in selected Wildlife Management Areas. Complete figures are being calculated by the AAC Consortium.

Table 11: Partial summary of hunting revenues in selected Wildlife Management Areas

WMA	CONTRACT	REVENUE ($)				
		2010	2011	2012	2013	2014
BURUNGE	YES 2013	3,685	6,552	7,429	83,573	22,091
ENDUIMET	YES 2014	-	13,718	5,810		71,029
IDODI-PAWAGA		14,208	4,333	2,478	40,660	36,079
IKONA	YES 2014	31,422	61,722	10,677	182,034	226,698
IPOLE		2,834	23,409	13,382	27,148	12,868
LIWALE-MAGINGO	YES 2014	15,907	8,416	4,814	22,252	22,050
MAKAO		-	15,729	17,994	-	28,863
MAKAME-INDEMA	YES 2014					START OPERATIONS
MBARANG'ANDU		4,648	4,909	2,808	30,026	-
MBOMIPA	YES 2013					START OPERATIONS
NGARAMBE-TAPIKA	YES 2014	23,920	24,006	15,783	-	-
TUNDURU		2,875	4,620	2,643	-	-
UKUTU		-	27,758	28,923	31,058	45,054
UYUMBU		1,312	2,860	1,636	13,136	29,828
TOTAL		100,811	198,032	114,377	429,887	494,560

In some WMAs, the revenue accrued is posted on notice bodies to ensure that locals understand the monies that their WMA gets from wildlife conservation activities. Such initiative is happening in Burunge and Enduimet WMAs.

10.2 Policy Achievements

The following are some of the Policy Achievements with regards to WMA establishment and conservation in general:

- ✓ The achievement of a fundamental shift in philosophy and approach regarding wildlife management in Tanzania.
- ✓ The approval of guidelines, laws and regulations including the Wildlife Conservation Act of 2009, and the WMA Regulations of 2012, which are critical in supporting the development of WMAs. Having a supportive legal framework helps the established WMAs flourish; encourages new WMAs to apply for gazetting; and demonstrates to the world that Tanzania is committed to CBNRM for the benefit of its people and wildlife.
- ✓ The gazettment of 21 WMAs that protect wildlife habitats and corridors, covering an area of 27,924Km^2 (roughly 3% of the Tanzania mainland), with 166 villages inhabited by about 480,000 people.
- ✓ The application for gazettment of 17 additional WMAs. Once the process of gazetting is duly completed, all the 38 WMAs will be operational and will extend the available lion, elephant, and other habitat in Tanzania. (Villages outside this process are approaching the government to form new WMAs.)
- ✓ Formation of the Authorized Associations Consortium (AAC), the apex body for all Authorized Associations(AA) As defined in the WMA Regulations of 2012 “Authorized Association” means a community based organization, whose primary objective is to conserve wildlife resources for the benefit of local community members ordinarily residing in that particular area. The AAC plays a critical role in the coordination, advocacy and implementation of WMA-related activities. The AAC provides a platform to the AAs to articulate their views and concerns of different stakeholders, plan and decide on matter of their common interests. The AAC provides an advocacy organization for WMAs, so they can promote policy change at the local and higher levels.The Consortium is a civil society organization intended to provide a platform to the AAs to articulate their views and concerns of different stakeholders, plan and decide on matter of their common interests. The organization was registered on 22nd January, 2010 under the Societies Act Cap. 337 (R.E. 2002), with certificate of registration No. 16619 as an umbrella for all WMAs which have attained" AA” status. The body has been mandated to operate within the framework of Wildlife Conservation Act (2009) and Wildlife Management Areas Regulations (2012).

  The specific objective of AAC includes:

  - *Promoting conservation and sustainable utilization of natural resources in the respective WMAs;*
  - *Fundraising and laying down procedures for use of financial resources in order to improve social services such as schools, infrastructure and hospitals around member WMAs;*
  - *Providing advisory services to AA members (particularly during planning of development projects), marketing, research and control of illegal offtake of natural resources;*
  - *Liaison with government, non-governmental organizations and/or private sector actors in all matter that affect AA members positively or negatively;*
  - *Dealing with issues related to licenses, permits and fees for natural resources based investments/businesses;*

- *Ensuring good public relationships with governments, NGOs and other institutions that work together with member AAs;*
- *Creating an enabling environment for tourism and hunting business in WMAs;*
- *Promoting, training and encouraging Law enforcement and ensuring the rule of law in all WMAs; and*
- *Dealing with all other issues for the benefits of its members but in compliance with existing policies and legislations.*

AAC has finalized a 5 years Strategic Plan for its functioning. (Annex 5)

- ✓ The enhancement of resource and land tenure rights to villagers forming WMAs
- ✓ The disbursement of hunting fees to WMAs to incentivize wildlife conservation. From 2010 to 2014, in excess of USD 1.3 million from safari hunting fees has been disbursed to respective WMAs (Table 11). This amount of money has greatly contributed to poverty reduction through wildlife utilization, both consumptive and non-consumptive.
- ✓ For the first time in 2013, the devolution to WMAs of the power to sign utilization contracts with the private sector (consumptive and non-consumptive). These arrangements which will last for five years (2018) have enabled seven WMAs and therefore the villages and people living there to sign contracts with hunting operators worth more than USD 4.3 million.
- ✓ Under the leadership of AAC, the initiation of a pilot project in 2013 in seven WMAs to establish a ground wildlife monitoring system using scientific based census methods. This system is of paramount important for sustainable wildlife utilization and quota setting. The system uses a customized reporting system based on Namibian MOMS (Management Orientated Monitoring System) which is one of the tools used by the communities in these WMAs to achieve proper wildlife monitoring. Importantly this system will enable WMAs to propose quotas to the Director of Wildlife.
- ✓ The approval of the WMA Implementation Strategy by the Ministry of Natural Resources and Tourism and launch of this strategy during the Arusha Workshop in July 2015 (Annex 6).

The Wildlife Management Area (WMA) Implementation Strategy reviews, summarizes and uses over a decade of positive lessons learned to inform activity implementation across all the WMAs. It is a product of a series of participatory consultative meetings, formal and informal interviews/discussions as well as interactive workshops spanning from August 2009 to September 2012. The objectives of undertaking the preparation of the WMA Implementation Strategy are to: identify challenges and issues facing WMA implementation since the 2003 launch of 16 pilot areas; determine the extent to which the WMA process has laid the foundation for an expanded wildlife-based tourism industry as well as assisted in the protection of wildlife resources; determine the value of WMA process in establishing and strengthening a national approach to CBNRM; develop an adaptive framework for increased acceptance of the WMA concept in addressing poverty but reflecting local conditions, cultural values and institutional choices; and provide important resource base information that will inform any future WMAs in making conservation decisions which will ensure that future generations will not be denied of these precious resources that we enjoy and benefit from. It charts out a course for conservation and development in village land endowed with wildlife. Once operational the strategy will: provide guidance to Government, NGOs, local government, private sectors, and local communities in the implementation of different activities to support development of WMAs; highlight the best WMA management approaches that will enable scaling-up the implementation of WMAs and to secure more and tangible benefits to local communities, districts and the nation; and finally recommend strategic options to overcome WMA implementation challenges. A vision, mission and goal of the Strategy have been developed; a total of eight (8) strategies with a set of implementation mechanisms for each strategy underpin the implementation and form the cornerstone of the WMA Implementation Strategy for the period 2014 - 2019. (MNRT 2014a).

10.3 WMAs benefits

- ✓ Increased protection of ecologically important areas
- ✓ Increased financial benefits to the WD, Districts and villages adjacent to PAs
- ✓ Empowered local communities to manage wildlife resources in the WMAs
- ✓ Empowered local communities to use the revenue obtained for various activities such as community development projects (water, health, education), employment, anti-poaching patrols, advocating conservation awareness, problem animals control, training of village game scouts, and other services to benefit the communities on the whole
- ✓ Provided the private sector with a wider scope to invest in tourism and hunting
- ✓ Improved conservation - wildlife and habitat restoration

11. Revenues and expenditure from safari hunting

As briefly outlined in section 4.1, Tanzania Wildlife Protection Fund (TWPF) was established under Parliament Act No. 21 of 1978 as provided in Section 69 of the' Wildlife Conservation Act (WCA) No. 12 of 1974. The existence of TWPF is also underpinned in the section 91(1) of current WCA No.5 of 2009. TWPF Secretariat supervises and coordinates funding activities as per directives from the TWPF Board of Trustee. Director of Wildlife is the Chief Executive Officer (CEO) of the fund and Administrative Secretary (AS), who is the accounting officer of the fund, is the principal assistant to the CEO.TWPF started its operations in 1983 after receiving seed money from Government Treasury.

TWPF continuously supports Game Reserves in infrastructure development such as road construction and maintenance, staff houses and office construction, water supply system among others. Nevertheless, TWPF supports quarterly direct cost for carrying anti-poaching activities in Game Reserves in order to supplement low budgetary allocation from Government Treasury. This is done in recognition to the contribution of Tourist hunting which is mainly conducted in Game Reserves, which account for over 70% of total TWPF earnings. Similarly, TWPF supports infrastructure development and direct cost for carrying anti-poaching activities in Zonal Anti-Poaching Units (ZAPUs). This is because Protected Areas (PAs) in Tanzania are not fenced and wildlife does not recognize strip boundary demarcations, hence ZAPUs mainly ensure survival of wildlife resources outside core PAs through anti-poaching operations and law enforcement. As a mechanism of providing incentives to the communities in districts that participate in wildlife conservation, TWPF supports community development projects such as building of schools upon screening of submitted proposals based on the stipulated criteria in TWPF guidelines for funding.
To-date, over 74% of the TWPF revenue is obtained from 25% of the total proceeds from the wildlife harvest in Game Reserves and Open Areas (OAs). Other sources include photographic tourism, donations, grants and fortified properties in accordance to Section 110 of Wildlife Conservation Act (WCA) No. 5 of 2009. It is the responsibility of the TWPF to solicit funds from other sources and invest in income generating activities to meet growing demand and challenges in wildlife conservation.

Safari hunting, including lions, is the main source of revenues for the Wildlife Division/TWPF (Table 12) and will be also the main source of revenues for the developing Tanzania Wildlife Authority (TAWA) and therefore for wildlife conservation in the country.

Funds generated from tourist safari hunting benefit lion in Tanzania by:

- Paying for conservation programs;
- Paying for anti-poaching programs, personnel, and equipment;
- Providing direct contributions from safari operators to anti-poaching patrols and scouts, and providing early detection and reporting of poaching incidents, all of which benefits the government by shifting these costs to the private sector;
- Increasing habitat and reducing lion-human conflict by benefiting local communities through Tanzania's growing Wildlife Management Areas (WMAs), including by disbursing 75% of the block fee and 70% of the permit fee to WMAs once it is paid by the concessionaire; and

- Justifying the preservation of most wildlife habitat and helping fund its management.

Table 12: Trend of revenue generated from Safari hunting and photographic tourism accrued to the Wildlife Division/TWPF*

Financial Year (July/June)	Safari hunting	Photographic Tourism(Areas under jurisdiction of WD)
2009/2010	18,444,881.00	2,706,603.00
2010/2011	23,536,347.00	2,863,287.24
2011/2012	15,062,217.75	2,080,978.00
2012/2013	15,917,430.93	3,904,808.35
2013/2014	16,723,425.00	5,016,703.03
2014/2015	16,277,373.00	4,736,187.00
2015/2016*(until May 2016)	12,066,774.00	4,004,038.00

*In US Dollars

75% of the game fees are retained by Treasury and 25% by the Wildlife Division (TWPF); of the 75% collected by Treasury, 25% is send to District Councils where the hunt took place. The District Council (DC), under current administrative procedures, use 60 % of this sum for communities' development projects and 40% for anti-poaching activities.
Treasury reassign part of the revenues to the Ministry during the annual budget exercise.

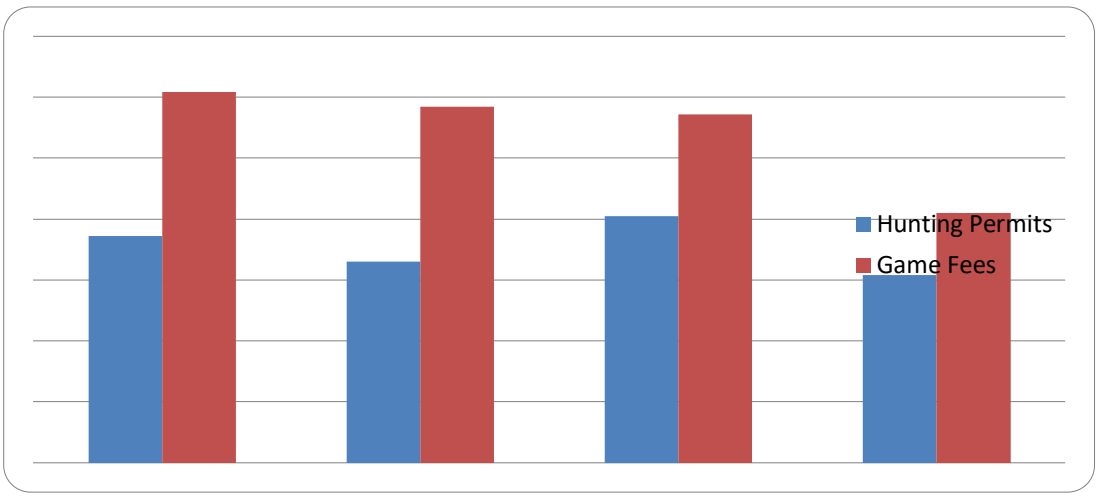
Once fully operational, the Tanzania Wildlife Management Authority (TAWA), will retain 100% of the hunting revenues, thereby changing the above mentioned system. At present there is a transition period and TAWA should be fully operational in the second half of 2016.

All the transactions are retrievable from the electronic permitting system (described in section 4.5).

The Selous Game Reserve is working under a special retention scheme whereby 50% of the revenues are retained by the Game Reserve.

A partial breakdown of the figures in Table 12 is given in Tables 13 and 14

Table 13 Revenues generated from Hunting permits and game fees



Revenues generated from Hunting Blocks varies depending of their categories. The following table 14 shows the revenues generated by hunting blocks fees:

Table 14 Revenues generated from Hunting Blocks

2013/2014	2014/2015	2015/2016
$4,295,000.00	**$4,684,000.00**	**$4,279,000.00**

A lion hunting license includes several fees, described in the Schedules of the Tourist Hunting Regulations of 2015. In particular, the Third Schedule regarding Game Fees values a lion hunt at 4,900 US$(rifle) and 6,125 US$ (bow). The Fifth Schedule applies to a lion hunt as a i) 21-day safari Permit Fee at 1,000 US$ (rifle) and 2,000 US$ (bow), a ii) conservation daily fee at 150 US$ per hunter ($150 x 21 = $3,150), and 100 US$ per observer fees ($100 x 21 = $2,100), and a iii) trophy handling fee at US$ 500.

The total of these fees per lion is a minimum of 9,550 US$ to 11,775 US$, excluding the observer fee (2,100 US$ for a 21 days' safari. Adding that would total 11,650 US$ to 13,875 US$ for each lion.

Lion Safari hunting is central in Tanzania, certainly being the major draw that attracts hunting clients to the country. Twenty-one days' hunting permits includes lion in 50-60% of the cases. Even though lions are not always harvested, the hunter pays for the associated fees and spends money on other fees, which generates income for conservation activities. Twenty-one days' safaris are the greatest generators of revenues from hunting in Tanzania and are required by the Hunting Regulations for lion and elephant.

Table 15: Total number of Hunting Permits per Package from 2012 to 2015

Package	Fee (for rifle. Bow different) IN USD	FY2012-2013	FY2013-2014	FY2014-2015	FY2015-2016
7 DAYS	1,250	0	25	47	29
10 DAYS	1,200	202	163	142	129
14 DAYS	1,100	0	25	36	27
16 DAYS	1,000	28	0	0	0
21 DAYS	1,000	558	479	494	375
28 DAYS	900	0	19	20	9
TOTAL		**788**	**711**	**739**	**569**

Table 15 provides a breakdown of the total number of Hunting permits per Package. For each Package a fee is paid in accordance with the Fifth Schedule of the Tourist Hunting Regulations.

11.1 Revenue from US hunters specific to lions

In section 7.1 we presented data on lion harvests for Safari hunting over the past eight years in Tanzania.

Here we present specific data on lion harvests by US citizens and their contribution to conservation activities in Tanzania.

The United States of America represents the most important single country market for Safari hunting in Tanzania. For example, in 2015, out of a total number of 569 permits to all nationalities (see table 15),242permits were issued to US clients, representing 42.5% of the permits issued. Of these permits, U.S. hunters booked 202 21-day safaris. These U.S. clients generated in FY 2015/2016 (up to January 2016, FY ends June 2016) an approximate revenue for the WD of $ 3,507,000 in permits fees (conservation, observer, trophy handling and package) and game fees.

Table 16 represents the minimum revenue accrued to the Wildlife Division from US hunters and

does not include for example the observer fee (USD100 a day i.e. 2100 USD for a 21 days' safari). Moreover, many hunters book a 21 day safaris which include lion paying the respective 9,550 US$ fees without harvesting a lion. Taking into account the figures in table 17 and the fact that more than 50% and up to 60% of the 21 days' safaris requested a lion, calculations can be made of the revenues generated from hunting permits which includes a lion. Finally, the contribution of the US hunters for lion harvesting is much higher than represented in this table. If all revenues and costs are included, such for example block fees and professional hunter fees, the contribution will increase exponentially.

Table 16: Lions harvested by US citizens 2012-2015 and minimum revenue accrued to the Wildlife Division

Year	Number of Lion Harvested by Hunters from the USA	Minimum Revenue US$ Per Lion*	Total US$
2012/13	30	$ 9,550.00	$286,500.00
2013/14	27	$ 9,550.00	$257,850.00
2014/15	23	$ 9,550.00	$219,650.00
2015/16	19	$ 9,550.00	$171,900.00
Total	99		$ 935,900.00

*Revenue includes only the following; Permit fee, Conservation fee, Game Fee, Trophy handling fee.

Table 17 shows the blocks where lions were harvested by US hunters from 2012 to 2015

Table 17 Blocks where Lions have been harvested by US citizens 2012-2015

Species	Block	FY 2012/2013	FY 2013/2014	FY 2014/2015	FY 2015/2016
LION	BURUNGE GAME CONTROLLED AREA	1			
LION	CHUNYA OPEN AREA (WEST)	1			
LION	INYONGA GAME CONTROLLED AREA (WEST)	1			
LION	INYONGA GCA C		1		
LION	INYONGA GCA E				2
LION	KITWAI GCA SE			1	
LION	KIZIGO GAME RESERVE (CENTRAL)	1			
LION	KIZIGO GAME RESERVE (EAST)	3			
LION	KIZIGO GAME RESERVE (WEST)	2			
LION	KIZIGO GR C		1	1	1
LION	KIZIGO GR W		1		1
LION	KUKWATI GAME CONTROLLED AREA (SOUTH)	2			
LION	LAKE RUKWA GCA			1	
LION	LOLKISALE GAME CONTROLLED AREA	1			
LION	LUGANZO GAME CONTROLLED AREA	1			
LION	LUKWATI GAME CONTROLLED AREA (NORTH)	1			
LION	LUKWATI GR N		1	1	1
LION	LUKWATI GR S		2	2	1
LION	LUNDA NKWAMBI GCA N		1		1
LION	MASWA GAME RESERVE (NORTH)	2			
LION	MASWA GR (N)		1		
LION	MASWA KIMALI GR		1		
LION	MASWA MBONO		1		
LION	MBARANGANDU OPEN AREA	1			
LION	MOYOWOSI GR S		1		
LION	MOYOWOSI/NJIGWE GR 2			2	1
LION	MOYOWOSI-NJINGWE GR 3			1	1
LION	MSIMA GAME CONTROLLED AREA (WEST)	1			
LION	MSIMA GCA E		2	1	
LION	MSIMA GCA W			1	
LION	MUHESI GR W			2	1
LION	RUNGWA IKILI GR			1	
LION	RUNGWA INYONGA GR		1	1	
LION	RUNGWA MPERA GAME RESERVE	1			
LION	RUNGWA MPERA GR		2	1	
LION	RUNGWA MZOMBWE OA		2	1	
LION	RUNGWA OA S				1
LION	RUNGWA RIVER GAME CONTROLLED AREA	1			
LION	RUNGWA RUNGWA GR (E)		2	1	1
LION	RUNGWA RUNGWA GR W		1		1
LION	RUNGWA-MZOMBE OPEN AREA (WEST)	3			
LION	SELOUS GAME RESERVE BLOCK LU2	1			
LION	SELOUS GAME RESERVE BLOCK RU1	1			
LION	SELOUS GAME RESERVE LU4	1			
LION	SELOUS GR K1	1			
LION	SELOUS GR LL1				2
LION	SELOUS GR LR2			1	
LION	SELOUS GR LR3		1		
LION	SELOUS GR LU1-LU2		1		1
LION	SELOUS GR LU7			1	
LION	SELOUS GR MA1			1	
LION	SELOUS GR MB2			1	
LION	SELOUS GR MHJ3				2
LION	SELOUS GR MS1				1
LION	SELOUS GR N1		2		
LION	SIMANJIRO KITIANGARE GCA			1	
LION	UGALLA GR E		2		
LION	UGUNDA GAME CONTROLLED AREA	2			
LION	WEMBERE GAME CONTROLLED AREA (SOUTH)	1			
	TOTAL	**30**	**27**	**23**	**19**

Although no lion was hunted in WMAs, at least by US hunters, WMAs are benefitting from 21 days' safaris trough the intercompany hunting arrangement. As defined in section 19 of the Tourist Hunting Regulation 2015 "intercompany hunting" means a situation where the Director of Wildlife has issued an additional hunting permit to a hunting company to conduct hunting in a hunting block belonging to another company for the purpose of enabling a hunting client to obtain species not hunted in its allocated hunting block.

Moreover, lions are harvested in GCAs and OAs thus bringing benefits to communities and alleviating HLC.

11.2 Expenditures by Wildlife Division

The revenues obtained by the different hunting fees from tourist hunters are invested in the operational costs of the protected areas which are under the jurisdiction of the Wildlife Division.

Not only Lion hunting contributes an important percentage to the operational costs (e.g. salaries of anti-poaching personnel, allowances, fuel, health care etc.) of Game Reserves and other hunting areas, but, as indicated in the previous section, it is the main driving species for the booking of 21 days Safaris that are one of the main revenue generators for the WD and the hunting sector.

Funds are distributed by TWPF to 17 Outstations and 8 Zonal Antipoaching Units (ZAPU) as shown in Table 18 that includes Ration Allowances, Drugs and Medicine, Domestic Per Diem, Diesel, Petrol Prosecutions, Casual Laborers, Utility, Motor Vehicles and Water Craft.

The table do not include additional funds distributed as Responsibility Allowances for Head of Station, Projects, and funds for other departments, that represent and additional expenditure also derived from hunting revenues.

Pasiansi Wildlife Training Institute, Likuyu-Sekamanga CBNR Institute and Selous Game Reserve have their own budgets and operates, in part, from funds distributed by TPWF, derived to a great extent from hunting revenues.

All budgets are available upon request.

Table 18. DISTRIBUTION OF FUNDS TO OUTSTATIONS FROM 2012 to 2016 (per Fiscal year) in TZS

Fiscal Year	Amount in TZS	Approximate amount in USD*
2012-2013	1.987.607.442,00	1,242,254
2013-2014	2.631.058.996,00	1,644,411
2014-2015	2.865.194.516,00	1.637,254
2015-2016(partial)	3.828.804.616,00	1,823,240

- Calculated at an average historical rate of exchange. (1USD=1600TZS for 2012-2013 and 2013-2014, 1 USD=1750 TZS for 2014-2015 and 1USD=2100TZS for 2015-2016).

The Wildlife Division is committed to introduce in the budget for the next Fiscal Year 2016-2017 (starting in July), which is in preparation now, a budget line to cover the costs of the lion aging system and of at least one survey from the hunting fee revenues.

12. Conclusions and Non-Detriment Findings

Tanzania is guided by four main principles in its conservation activities:

- Responsibility principle - Responsibility to use resources in an ecologically sustainable, economically efficient and socially just manner
- Precautionary principle - The absence of adequate scientific information shall not be used as a reason for postponing or failing to take conservation and management measures
- Adaptive management principle - Learning-by-doing
- Participatory principle - The importance of full stakeholder participation in the formulation and implementation of decisions

Tanzania has implemented in recent years a series of recommendations deriving from scientific literature to address the management of Safari hunting and enhance its contribution to lion conservation, bearing the responsibility of having the biggest wild lion population in Africa and on Earth.

These include recommendations formulated by various authors (Whitman et al. 2004, 2007; Packer et al. 2006;Palazy et al. 2011;Hunter et al. 2013; Lindsey et al. 2013; and Bauer et al. 2015), and specifically recommendations on the implementation and enforcement of age restrictions (6 years or older); improved, independent trophy monitoring and adaptive management of quotas; implementation of maximum quotas to prevent excessive harvests, until age restrictions and trophy monitoring are in place (Tanzania is even stricter, having maintained and reduced its quota even though age restrictions and trophy monitoring are in place); restriction of harvest to males; and a minimum length of lion hunts of at least 21 days (to allow time for selection and to maximize revenues) fixed- quotas which encourage over-harvest; lack of age restrictions; and hunting of females.

At present, Safari hunting has a very insignificant impact on the lion population and it is not a threat contributing to their potential decline. On the contrary it plays a significant role in maintaining ecosystems, protecting species against illegal activities and providing tangible benefits to Tanzania's economy and the livelihoods of Tanzania's rural people.

Lion Safari hunting is central in Tanzania, certainly being the major draw that attracts hunting clients to the country. Lion trophies are asked for in more than half of the hunting permits yearly issued. The United States of America (U.S.) represents the most important market for Safari hunting in the Tanzania with more than 40%of clients coming from US.

In Tanzania, wildlife conservation is at first hand a matter of land use. Proclaimed protected areas gazetted as hunting areas (304,399.95 km2) are ca. 5 times larger than protected areas without safari hunting activity (57,838 km2). Protected areas gazetted as hunting areas cover about one third of the country and serve as prime reservoirs of global biodiversity, securing maintenance of natural ecosystems and prey base for lions.

Human population in Tanzania has significantly increased since 1950 (i.e. 7 million in 1950 against 46 million in 2011) and is projected to increase by 500 per cent or more by 2100 (United Nations, 2011). During 2011-2100, six countries are expected to account for half of the world's projected population increase, with Tanzania being among them (United Nations, 2011). As a result, there is considerable pressure to convert land to agro-pastoral production, and the pressure is expected to increase tremendously, given the above-mentioned projections from the United Nations.

Financial resources for conservation, particularly in developing countries such as Tanzania, are limited. As such, consumptive (including Safari hunting) and non-consumptive (photo tourism safaris) uses are both needed to generate funding. Without these, many natural habitats would otherwise be converted into agricultural or pastoral uses, producing inevitable habitat loss.

The Safari hunting sector's sustainability would be threatened by the loss of its main attracting

product (the lion) combined to the loss of its main market (the USA). A lot of hunting companies operating will return most (if not all) of their hunting areas to the Wildlife Division to avoid bankruptcy. As a consequence, many protected areas devoted to safari hunting will be converted to agro-pastoral land, leading to the unavoidable extinction of wildlife and natural habitats with collapse of ecosystem services. This negative consequence is that the WD seeks to avoid and is a powerful reason to support regulated, sustainable safari hunting in Tanzania. It is clear, based on the data collected here, that safari hunting in Tanzania benefits the lion by mitigating the primary threats to the lion.

In this document consideration has been given to the population of lion in Tanzania; the quota-setting system which recognizes the scientific formulated thresholds of 1lion/1000km^2 in high density areas and 1lion/2000km^2 in low density areas and the consequent current precautionary quota of 200 lions; the National Carnivore Action Plan; the well developed and implemented age-based harvest policy; the limited harvest and the incentives to conservation represented by the substantial revenues generated by safari hunting for Wildlife Division operations, anti-poaching, and community development. The Scientific Authority has considered the current threats to lion, including loss of habitat and human-lion conflicts, and potential of safari hunting to mitigate those threats.

Safari hunting provides a net benefit to the species, it does not pose a threat to the species, and it is not a detriment to the survival of the species. Regulated safari hunting of lion in Tanzania enhances the survival of the species. Lion is neither endangered nor threatened in Tanzania.

The United Republic of Tanzania expects CITES Parties to implement CITES Resolution Conf. 2.11 with particular reference to paragraph b) that states: "*in order to achieve the envisaged complementary control of trade in Appendix-I species by the importing and exporting countries in the most effective and comprehensive manner, the Scientific Authority of the importing country accept the finding of the Scientific Authority of the exporting country that the exportation of the hunting trophy is not detrimental to the survival of the species, unless there are scientific or management data to indicate otherwise*".

Upon considering all the factors illustrated in this document and in accordance with Article IV of CITES and CITES Resolution Conf.16.7, the Scientific Authority of Tanzania has advised the Management Authority that the low level of off-take generated by safari hunting is not detrimental to the survival of the lion in Tanzania and enhances its survival and the amount of revenues generated by this low level of off-take are of crucial importance for the conservation of the species also because of the benefits it provides to rural communities.

13. References

Baldus, R.D and Michel, S. 2011. What does CITES mean for an African or Central Asian village? Some experiences from Tanzania and Tajikistan. In Abensperg-Traun, M., Roe, D. & O'Criodain, C., eds. 2011. CITES and CBNRM. Proceedings of an international symposium on "The relevance of CBNRM to the conservation and sustainable use of CITES-listed species in exporting countries", Vienna, Austria, 18-20 May 2011. Gland, Switzerland: IUCN and London, UK: IIED. 172pp.https://portals.iucn.org/library/efiles/documents/SSC-OP-046.pdf

Bauer, H., Packer, C., Funston, PF, Henschel, P. & Nowell, K. 2015. Panthera leo. The IUCN Red List of Threatened Species. Version 2015.2. <www.iucnredlist.org>. Downloaded on 20 January 2016.

Begg, C. & Begg, K. 2008. Trophy monitoring of lion and leopard trophies in Niassa National Reserve, Mozambique: 2007 hunting season. Ratel Trust & SRN, Mozambique.

Brink, H. 2010. Hunting for Sustainability: Lion Conservation in Selous Game Reserve, Tanzania. A thesis submitted for the degree of Doctor of Philosophy in Biodiversity Management. Durrell Institute of Conservation and Ecology (DICE). University of Kent

Brink, H., Smith, R.J. & Skinner, D. 2013. Methods for lion monitoring: a comparison from the Selous Game Reserve, Tanzania. African Journal Ecology, 51, 366-375.

Ceppi, S. L. and Nielsen, M. R. 2014. A comparative study on bushmeat consumption patterns in ten tribes in Tanzania. Tropical Conservation Science 7:272-287.

Chardonnet, P., Soto,B., Fritz, H., Crosmary,W., Drouet-Houget,N., Mésochina,P., Pellerin,M., Mallon,M., Bakker,L., Boulet, H. &Lamarque, H. 2010.Managing the conflicts between people and lion: review and insights from the literature and field experience. Wildlife Management Working Paper 13. Food and Agriculture Organization of the United Nations. Rome.

Cheater, A. 2006. Use of the upper second premolar for age determination of the African lion (*Panthera leo*) in Sub-Saharan Africa, for purpose of remote monitoring. Tshwane University of technology, South Africa.

Di Minin, E., Leader-Williams, N., Bradshaw, C.J.A. 2016. Banning Trophy Hunting Will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, Volume 31, Issue 2, 99 – 102.

Ferreira, S. & Funston, P. 2010. Age assignment to individual African lions. South African Journal of Wildlife Research, 40, 1-9.

Fischer, A., Sandstrom, C., Delibes-Mateos, M., Arroyo, B., Tadie, D., Randall, D., Hailu, F., Lowassa, A., Msuha, M., Kerezi, V., Linnell, J. &Majic, A. 2013. On the multifunctionality of hunting: An institutional analysis of eight cases from Europe and Africa. Journal of Environmental Planning and Management 56: 531-552

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A., et al. 2010. Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. Journal of Zoology, 281, 56-65.

Hamunyela, E., Aschenborn, O., & Grange, S., 2013. African Lion Database: An Updated Comprehensive Review of Data on the African Lion (Panthera leo) for the last decade (2002-2012). Progress Report, January 2013

Hayward, M.H. & Kerley, G.I.H., 2005. Prey preferences of the lion (Panthera leo). Journal of Zoology, 267, 309–322.

Hayward, M. W., O'Brien, J., & Kerley, G.I.H., 2007. Carrying capacity of large African

predators: predictions and tests. Biological Conservation, 139(1), 219-229.

Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L. et al. 2013. Urgent and comprehensive reform of trophy hunting of lions is a better option than an endangered listing; a science-based consensus. Public comment to USFWS. New York.

Ikanda, D.K. & Packer, C. 2006. Lion abundance and distribution in Tanzania - A status report to the Wildlife Division, unpublished report, Tanzania.

Ikanda, D.K. 2007. Assessment of man-eating outbreaks by African lions (Pantheraleo) in southeastern Tanzania. In: J. Hughes and R. Mercer (eds), Felid Biology and Conservation Conference 17-20 September: Abstracts, pp. 53. WildCRU, Oxford, UK.

IUCN. 2006a. Conservation strategy for the lion in West and Central Africa. Yaounde, Cameroon.

IUCN. 2006b. Regional conservation strategy for the lion *Panthera leo* in Eastern and Southern Africa.

IUCN SSC. 2012. IUCN SSC Guiding principles on trophy hunting as a tool for creating conservation incentives. Ver. 1.0. IUCN, Gland.https://cmsdata.iucn.org/downloads/iucn_ssc_guiding_principles_on_trophy_hunting_ver1_09aug2012.pdf

IUCN. 2016. Informing decisions on trophy hunting: a Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies.http://cmsdata.iucn.org/downloads/iucn_informingdecisionsontrophyhuntingv1.pdf

Kiffner, C., Meyer, B., Mühlenberg, M. &Waltert, M. 2009. Plenty of prey, few predators: what limits lions Panthera leo in Katavi National Park, western Tanzania? Oryx, 43, 52-59.

Kiffner, C., S. Nagar, C. Kollmar, J. Kioko, Wildlife species richness and densities in wildlife corridors of Northern Tanzania, Journal for Nature Conservation, Volume 31, June 2016, Pages 29-37, ISSN 1617-1381, http://dx.doi.org/10.1016/j.jnc.2016.02.006.

Kinnaird, M. F., & O' Brien, T. G. (2012). Effects of private land-use, livestock management, and human tolerance on diversity, distribution and abundance of large African Mammals. Conservation Biology, 26, 1026–1039.

Kissui B.M. 2008. Livestock predation by lions, leopards, spotted hyenas and their vulnerability to retaliatory killing in the Maasai Steppe, Tanzania. Animal Conservation, 11, 422-432.

Knapp, E. J. 2012. Why poaching pays: a summary of risks and benefits illegal hunters face in Western Serengeti, Tanzania. Tropical Conservation Science Vol. 5(4):434-445. Available online: www.tropicalconservationscience.org

Kushnir, H.,Leitner, H.,Ikanda, D.K- and Packer, C. 2010. Human and Ecological Risk Factors for Unprovoked Lion Attacks on Humans in Southeastern Tanzania', Human Dimensions of Wildlife, 15: 5, 315 — 331 http://dx.doi.org/10.1080/10871200903510999

Lichtenfeld, L.L. 2005. Our shared kingdom at risk: human–lion relationships in the 21st century. PhD Dissertation, Yale University, CT.

Lindsey, P.A., Balme, G.A., Booth, V.R., &Midlane, N. 2012. The significance of African lions for the financial viability of trophy hunting and the maintenance of wild land. PlosOne, 7, e29332.

Lindsey, P.A., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., Midlane, N. and Nyirenda, V. 2013. The trophy hunting of African lions: scale, current management

practices and factors undermining sustainability. PloS one, 8(9): e73808.

Lindsey, P. A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R. W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J. W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., van der Westhuizen, H., van Vliet, N. and Zisadza-Gandiwa, P. 2015a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. FAO/Panthera/Zoological Society of London/WCS Report, Harare. 79 pages.

Lindsey, P., Taylor, W.A., Nyirenda, V., Barnes, L., 2015b. Bushmeat, wildlife-based economies, food security and conservation: Insights into the ecological and social impacts of the bushmeat trade in African savannahs. FAO/Panthera/Zoological Society of London/SULi Report, Harare. 58 pages.

Loibooki, M., Hofer, H., Campbell, K.L.I., and East, M.L. 2002. Bushmeat hunting by communities adjacent to the Serengeti National Park, Tanzania: the importance of livestock ownership and alternative sources of protein and income. Environmental Conservation 29:391-398.

Martin, A. and Caro, T. 2013. Illegal hunting in the Katavi-Rukwa ecosystem. African Journal of Ecology 51:172-175.

Mésochina, P., Mbangwa, O., Chardonnet, P., Mosha, R., Mtui, B., Drouet, N., Crosmary, W., &Kissui, B. 2010. Conservation Status of the lion (*Panthera leo* Linnaeus, 1758) in Tanzania. IGF Foundation and WD, France.

Miller, J.R.B., Balme, G., Lindsey, P.A., Loveridge, A.J., Becker, M.S., Begg, C., Brink, H., Dolrenry, S., Hunt, J.E., Jansson, I., MacDonald, D.W., Mandisodza-Chikerema, R.L., Oriol Cotterill, A., Packer, C., Rosengren, D., Stratford, K., Trinkel, M., White, P.A., Winterbach, C., Winterbach, H.E.K. & Funston, P.J. 2016. Aging traits and sustainable trophy hunting of African lions Biological Conservation, 201, 160–168.

Mfunda, I.M. and Røskaft, E. 2010. Bushmeat hunting in Serengeti, Tanzania: an important economic activity to local people. International Journal of Biodiversity Conservation 2:263-272.

Millennium Ecosystem Assessment. 2005. Five Volumes, Island Press.

MNRT. 2013. The Wildlife Sub-sector Statistical Bulletin. Wildlife Division, Dar Es Salaam, Tanzania.

MNRT. 2014. Ministry of Natural Resources and Tourism of the United Republic of Tanzania National Strategy to Combat Poaching and Illegal Wildlife Trade. October 2014.

MNRT. 2014a. Ministry of Natural Resources and Tourism of the United Republic of Tanzania WMA Implementation Strategy 2014 - 2019 Wildlife Division, Dar es Salaam

Ndibalema, V.G. and Songorwa, A.N. 2008. Illegal meat hunting in Serengeti: dynamics in consumption and preferences. African Journal of Ecology 46:311-319.

Nielsen, M. R., Jacobsen, J. B. and Thorsen, B. J. 2014. Factors determining the choice of hunting and trading bushmeat in the Kilombero Valley, Tanzania. Conservation Biology 28:382-391.

Packer, C., Ikanda, D.K. &Kissui, B.M. 2005. Human-Lion conflict survey in rural Tanzania, Aug-2004-Apr- 2005. Technical report to the Widlife Division, Dar Es Salaam, 27 pages.

Packer, C., Ikanda, D., Kissui, B. and Kushnir, H. 2006 The Ecology of Man-Eating Lions in Tanzania. Nature &Faune Vol. 21, Issue 2 Food and Agriculture Organization of the United

Nations. Accra, Ghana

Packer, C., Whitman, K., Loveridge, A.J., Jackson III, J. and Funston, P. 2006. Impacts of Trophy Hunting on Lions in East and Southern Africa: Recent offtake and future recommendations. Background paper for the eastern and southern African Lion Conservation Workshop, Johannesburg, South Africa, 11-13 January 2006. 15 pp.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D. &Nowell, K. 2009. Sport hunting, predator control and conservation of large carnivores. PLoS One, 4, e5941.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., & Caro, T. 2011. Effects of trophy hunting on lion and leopard populations in Tanzania. Conservation Biology, 25, 142-153.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., DeIongh, H.H., Joubert, D., Kissui, B., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salerno, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. &Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters, 16, 635-641.

Palazy, L., Bonenfant, C., Gaillard, J.-M. and Courchamp, F. 2011. Cat dilemma: too protected to escape trophy hunting? PloS one, 6(7): e22424.

SADC. 2015. Southern African Development Community. Law Enforcement and Anti-Poaching Strategy. SADC Secretariat.

Smuts, G. L., Anderson, J. L., & Austin J. C. 1978. Age determination of the African lion (*Panthera leo*). Journal of Zoology, London, 185, 115-146.

United Nations, Department of Economic and Social Affairs, Population Division, 2011. World Population Prospects: The 2010 Revision, Highlights and Advance Tables. Working Paper No. ESA/P/WP .220.

USFWS 2015. United States Department of the Interior, Fish and Wildlife Service. 50 CFR Part 17 [Docket No. FWS–R9–ES–2012–0025; 450 003 0115] Endangered and Threatened Wildlife and Plants; Listing Two Lion Subspecies. Final Rule.https://www.regulations.gov/ -!documentDetail;D=FWS-R9-ES-2012-0025-7055

USAID. 2013. Tanzania Wildlife Management Areas, Final Evaluation Report.

White, P. 2010. A regional guide to aging lions in Zambia. Zambia Lion Project, Zambia.

White, P. A., Ikanda, D., Ferrante, L., Chardonnet, P., Mésochina, P., &Cameriere, R. 2016. Age estimation of African Lions Panthera leo by ratio of tooth areas. PLoS ONE, 11(4): e0153648. doi: 10.1371/journal.pone.0153648

Whitman, K., Starfield, A.M., Quadling, H.S. & Packer, C. 2004. Sustainable trophy hunting of African lions. Nature, 428, 175-178.

Whitman, K., & Packer, C. 2007. A hunter's guide to aging lions in Eastern and Southern Africa. Savannas Forever & Conservation Force, Tanzania & USA.

Whitman, K.L., Starfield, A.M., Quadling, H. and Packer, C. 2007. Modelling the effects of trophy selection and environmental disturbance on a simulated population of African lions. Conservation biology: the journal of the Society for Conservation Biology, 21(3): 591–601.

Williams, V.L., Newton, D.J., Loveridge, A.J. & Macdonald, D.W. 2015. Bones of Contention: An Assessment of the South African Trade in African Lion Panthera leo Bones and Other Body Parts. TRAFFIC, Cambridge, UK & WildCRU, Oxford, UK

WWF 1997. Quota Setting Manual. WWF Zimbabwe, Zimbabwe Trust & SCI, ZW& USA.

APPENDIX 1 Assessment of the Enhancement and Non-Detriment Findings against the IUCN SSC "Guiding principles on trophy hunting as a tool for creating conservation incentives. Ver. 1.0. IUCN SSC (2012)"

An assessment of the Enhancement and Non-Detriment Finding on Lion in Tanzania against the IUCN SSC GUIDING PRINCIPLES ON TROPHY HUNTING AS A TOOL FOR CREATING CONSERVATION INCENTIVES. VER. 1.0. IUCN SSC (2012), was done by the Wildlife Division and TAWIRI in recognition of the importance of the implementation of these principles to be applied as a guidance to manage trophy hunting as a legal, regulated conservation activity which provides a critical tool to secure a sound social, economic and ecological conservation scenario.

Biological Sustainability

Trophy hunting* can serve as a conservation tool when it:

#	Principle	Remarks
1	**Does not contribute to long-term population declines of the hunted species or of other species sharing its habitat, noting that a sustainably harvested population may be smaller than an unharvested one**	Safari hunting has an insignificant impact on the lion population in Tanzania because the offtake is limited and low. It is not a threat contributing to the population's potential decline. Tanzania sets its lion quota in accordance with sustainable limits (e.g., 1 lion/2,000 $km^2$for normal density or 1 lion per 1,000 $km^2$for high density areas, see Packer et al. (2011)). Considering the latest available estimate of lion population size in Tanzania (i.e. 16,800; Mésochina et al. 2010), trophy hunting harvested a yearly mean of 1.34% (min: 0.53%; max: 2.46%) of lion males ranging in the country, for the past eight years. This figure is considered as low and has decreased since the establishment of age restriction rules on lion hunting, i.e. Tourist Hunting Regulations of 2010. This low offtake is sustainable and generates significant financial and other benefits.
2	**Does not substantially alter processes of natural selection and ecosystem function; that is, it maintains "wild populations of indigenous species with adaptive gene pools." This generally requires that hunting offtake produces only minor alterations to naturally occurring demographic structure. It also requires avoidance of breeding or culling to deliberately enhance population-genetic characteristics of species subject to hunting that are inconsistent with natural selection**	Safari hunting in Tanzania does not substantially alter natural selection or ecosystem processes. Tanzania's limited quota, as further limited by age restrictions, ensures that hunting offtakes do not negatively affect natural processes. This age-based policy was adopted in part to mitigate any social or population impacts from limited safari hunting. (Whitman et al. 2004). Tanzania maintains a large wild lion population (approximately 16,800 (Mésochina et al. 2010)) across a wide permanent and transient range, which contributes to an adaptive gene pool. No captive breeding or breeding for specific characteristics is done for lion in Tanzania.
3	**Does not inadvertently facilitate poaching or illegal trade of wildlife**	Safari hunting in Tanzania does not inadvertently facilitate poaching or illegal trade.

		Poaching and illegal trade in lion products is currently very low in the country, which suggests that the existence of licensed, regulated hunting is help control poaching and not facilitating it. Hunting operators are in the frontlines against poaching. Concession lease agreements require assistance with anti-poaching. Operators spend significant resources on this and must submit annual reports to the Wildlife Division documenting their efforts. Even where anti-poaching is not a legal prerequisite, operators fund their own anti-poaching teams and support government rangers and community scouts.
4	**Does not artificially and/or substantially manipulate ecosystems or their component elements in ways that are incompatible with the objective of supporting the full range of native biodiversity**	Hunting in Tanzania does not manipulate ecosystems in ways that are incompatible with supporting biodiversity. To the contrary, hunting has created financial incentives for the development and retention of wildlife as a land use across an area of 300,400 km^2, where hunting is a primary land use. Hunting areas serve as buffer zones for many national parks. The abandonment of safari hunting as a land use option would put at risk an enormous amount of land that provides habitat for diverse species, at least 44,000 km^2 would be at risk of conversion to other land uses. That is over three-quarters the area of Tanzania's national parks, and is roughly the same amount of area as Kenya's national parks and reserves. (WDPA 2016).

Net Conservation Benefit

Trophy hunting can serve as a conservation tool when it:

#	Principle	Remarks
1	**Is linked to identifiable and specific parcels of land where habitat for wildlife is a priority (albeit not necessarily the sole priority or only legitimate use); and on which the "costs of management and conservation of biological diversity [are] internalized within the area of management and reflected in the distribution of the benefits from the use"**	Hunting in Tanzania is linked to identifiable land areas where providing habitat and sustaining wildlife populations is a priority. Protected areas gazetted as hunting areas (304,400 km^2) are ca. 5 times larger than protected areas without safari hunting activity (57,838 km^2). Protected areas gazetted as hunting areas cover about one-third of Tanzania and serve as prime reservoirs of global biodiversity, securing maintenance of natural ecosystems and prey base for lions. Hunting areas include 28 Game Reserves, 44 Game Controlled Areas, 38 Wildlife Management Areas and 57 Open Areas subdivided in 196 Hunting Blocks.

		As much as possible, the costs and benefits of management and conservation are localized. A realistic estimate of costs of management incurred by hunting companies on a yearly basis ranges from $300,000 to $500,000 per block, which includes the expense of camps, salaries, anti-poaching, fuel, community assistance, etc. Many of the government's costs of maintaining Game Reserves and Game Controlled Areas are transferred to the private sector through private anti-poaching units or contributions towards government rangers and equipment. Further, revenues from hunting are used for anti-poaching, block maintenance and development, and contributions to communities living nearby. In WMAs, which are community-controlled lands, the majority of fees goes to the community, as directed by the Tourist Hunting Regulations (2015). Much of the revenue generated also goes to the communities pursuant to negotiated payments, employment, and voluntary contributions by hunting operators. In hunting areas in particular (as compared to the national parks), the costs and benefits of wildlife in the area are internalized and distributed within the area of management.
2	**Produces income, employment, and/or other benefits that generate incentives for reduction in pressures on populations of target species, and/or help justify retention, enhancement, or rehabilitation of habitats in which native biodiversity is prioritized. Benefits may create incentives for local residents to co-exist with such problematic species as large carnivores, herbivores competing for grazing, or animals considered to be dangerous or a threat to the welfare of humans and their personal property**	Hunting produces direct and indirect income, employment, and other benefits that generate incentives that reduce the threats to wildlife populations in Tanzania. In the period from 2006 to 2013, approximately $115 million accrued to the Wildlife Division from the revenues of trophy hunting. This revenue pays for the daily wildlife conservation work in Tanzania, including research projects, surveys, anti-poaching, and other services. Nearly 80% of the Wildlife Division/TWPF's anti-poaching budget comes from hunting revenue. Hunting generates income for local communities organized as WMAs, which lease the habitat and receive lease payments and revenue and fee shares, as well as voluntary contributions and meat. In 2014, lease payments from hunting operators alone generated $612,000 in revenue for WMAs. Thousands of people are employed in the hunting sector on a permanent basis and many more on a seasonal basis. In just 2014 and 2015 alone, hundreds of new rangers have been employed. Wild areas of Tanzania provide biodiversity services, i.e. ecosystem services, through the

		provision of recreational opportunities such as hunting and the aesthetic enjoyment of the wildlife that utilize these landscapes. Safari hunting plays an important role in the ecosystem services as defined in the Millennium Ecosystem Assessment (MA) (2005), i.e. "the benefits people obtain from ecosystems." Safari Hunting is both a provisioning and cultural service (two of the four categories) of services identified by the MA. The Safari hunting system in Tanzania where operators pays fees and other payments to encourage ecosystem and species conservation, and rural livelihoods, could be considered as a Payment for Ecosystem Services (PES). Its contribution in this regard and in the whole framework of Ecosystem Services shall be analyzed further and it is the intention of the Wildlife Division to start working on this subject as a priority.
3	**Is part of a legally recognized governance system that supports conservation adequately and of a system of implementation and enforcement capable of achieving these governance objectives**	Wildlife species in Tanzania, including African lion, are protected under the Wildlife Conservation Act No.5 of 2009.This Act protects the species' natural habitat and prey, primarily through a network of protected areas and limits on offtake of listed species. The Act is implementing through the Wildlife Conservation regulations. Safari hunting is regulated by the Wildlife Conservation (Tourist Hunting) Regulations updated in 2015. In areas that allow hunting, the Act and Regulations are implemented by the Wildlife Division and the newly operational Tanzania Wildlife Authority (TAWA). Funding comes from the Tanzania Wildlife Protection Fund. District Councils are responsible for setting wildlife management and conservation policy in WMAs, as overseen by the WD. These entities, along with the entities that oversee strictly protected areas such as TANAPA and the NCAA and scientific entities such as TAWIRI, are responsible for implementing the Lion and Leopard Plan. They are all overseen by and report to the MNRT.

Socio-Economic-Cultural Benefit

Trophy hunting can serve as a conservation tool when it:

#	Principle	Remarks
1	**Respects local cultural values and practices (where "local" is defined as sharing living space with the focal wildlife species), and is accepted by (and preferably, co-managed and actively supported by) most members of the local community on whose land it occurs**	The Tourist Hunting Regulations require safari operators to contribute no less than $5,000 per year the communities within and adjacent to their concessions. Operators discuss with the villages how to use the contributions and work with the villages to implement community and infrastructure development and projects. There are currently 21 gazetted Wildlife Management Areas (WMAs) in Tanzania and the majority of these WMAs depend on Tourist Hunting as the only viable investments currently supporting conservation work and community development services. Employment ventures for local communities enable them to meet basic needs at household and community levels. These opportunities are provided by investors also in the hunting sector and WMA Associations.
2	**Involves and benefits local residents in an equitable manner, and in ways that meet their priorities**	WMAs represent the community based conservation system of Tanzania and they are seen as a key component of rural development and as one of the best weapons in the fight against illegal utilization. WMAs provide enhanced protection of critical habitats outside of protected areas and represent the best hope for conserving wildlife outside of Tanzanian protected areas while enhancing rural economic development through consumptive and non-consumptive use investments. In 2012 the regulations governing WMAs were revised to increase benefits-sharing and to vest communities with greater rights to negotiate the leases and elect the safari operators who will oversee the WMA concessions That WMAs benefit local communities is demonstrated by the current registration of 21 WMAs, the pending registration of another 17 WMA and continued enquiries from communities about becoming gazetted.
3	**Adopts business practices that promote long-term economic sustainability**	For the first time in 2013, WMAs has received the power to sign utilization contracts with the private sector (consumptive and non-consumptive). These arrangements which will last for five years (2018) have enabled WMAs and therefore the villages and people living there to sign contracts with hunting operators worth more than USD 4.3 million. The approval of the WMA implementation strategy streamlines the processes to strengthen CBRNM in Tanzania.

		Long-term economic sustainability of community based programs involving trophy hunting depends also on the international framework on trade as international trade restrictions can jeopardize conservation programs.

Adaptive Management: Planning, Monitoring, and Reporting

Trophy hunting can serve as a conservation tool when it:

#	Principle	Remarks
1	**Is premised on appropriate resource assessments and/or monitoring of hunting indices, upon which specific quotas and hunting plans can be established through a collaborative process. Optimally, such a process should (where relevant) include local communities and draw on local/indigenous knowledge. Such resource assessments (examples might include counts or indices of population performance such as sighting frequencies, spoor counts) or hunting indices (examples might include trophy size, animal age, hunting success rates and catch per hunting effort) are objective, well documented, and use the best science and technology feasible and appropriate given the circumstances and available resources**	Licensed, regulated hunting in Tanzania is permitted under an adaptively set quota system. Quotas are set using monitoring data and input from a variety of stakeholders including the Wildlife Division, TAWIRI, government rangers and scouts, local communities, hunting operators, and field biologists. Quotas are set based on population estimates or trend analyses, monitoring data, hunt return data, research work and indices as may be reflected in various reports by field personnel. For lion specifically, following consultations with the Scientific Authority (TAWIRI), the CITES Management Authority (WD) has decided to introduce a new export quota for lion hunting trophies of 200 specimens. This will be effective at the start of the next hunting season, commencing in 1st July 2016. This new quota is (i) a reduction of one third of the previous quota and (ii) 25% below the sustainable harvest level suggested by the CITES Scientific Authority (TAWIRI) and Packer et al. (2011), i.e. 1 lion/2000Km^2 for most hunting areas, and 1 lion/1000Km^2 for the Selous Game Reserve and other high density areas, and taking into account the lion range in Tanzania (permanent presence range for lion of 516,900 km2, and a temporary presence range of 232,800 km^2). The new quota is a further precautionary measure, complementing the strict age restriction regulation implemented since the entry into force of the Tourist Hunting Regulations of 2010. It is a three tier limit, i.e., age, number per square kilometer, and maximum overall number. It made sense to the Management Authority to reduce the quota because the prior quota was never utilized fully, and the lower maximum level of offtake demonstrates Tanzania's commitment to sustainable hunting.
2	**Involves adaptive management of hunting quotas and plans in line with results of resource**	Quotas are set adaptively in line with the results of monitoring. Further, quotas for lion are also managed based on regulatory compliance. If an

	assessments and/or monitoring of indices, ensuring quotas are adjusted in line with changes in the resource base (caused by ecological changes, weather patterns, or anthropogenic impacts, including hunting offtake)	underage lion is harvested, the quota for that area is reduced in the next season to allow the population to age and to penalize the non-compliance. In this way, Tanzania ensures responsible and sustainable offtakes that have limited impact on the lion population. Quotas are reviewed by the Quota Allocation Advisory Committee, comprised of wildlife conservation experts from TAWIRI, the University of Dar es Salaam, Sokoine University of Agriculture, University of Dodoma, the College of African Wildlife Management, and the Wildlife Division. The Committee provides a second review of the quota setting, which doubly ensures the sustainability of the offtakes.
3	**Is based on laws, regulations, and quotas (preferably established with local input) that are transparent and clear, and are periodically reviewed and updated**	Safari hunting in Tanzania is regulated through the Wildlife Conservation Act no.5 of 2009 and a number of Regulations among which the principal one is the Tourist Hunting Regulations recently amended in 2015. As described above. quotas are established in a transparent and participatory way.
4	**Monitors hunting activities to verify that quotas and sex/age restrictions of harvested animals are being met**	The monitoring of the lion hunting is carried out through the implementation of a specific database and a specific safari return form. Based on all hunting permits issued by (and compulsorily returned to) the Wildlife Division, a specific database has been set up to record lion hunting harvests. Regularly updated, the database is used to follow-up lion Safari hunting activity and trophy skulls that must be presented to the Wildlife Division for inspection. Since mid-August 2011, all professional hunters conducting lion hunting safaris are required to fill in the safari return form for both successful and unsuccessful safaris. With this form general information on the course of the safari, the lion population status and lion Safari hunting success are collated. For the successful lion hunting safaris, additional information like the hunting effort, specific measurements (total length and shoulder height) and specified photographs are taken. Safari return forms and trophy photographs are compulsorily provided by the hunting companies to the Wildlife Division. No CITES export permit can be issued without compliance. All offtakes are reviewed by the CITES Scientific Authority (TAWIRI) to ensure the offtakes and subsequent exports are not detrimental to the survival of the species. Also operators are required to submit annual reports on the status of the concessions, anti-poaching, community and block development, and other matters to the Wildlife Authority. These reports are used to assess compliance with the

		Wildlife Conservation Act and the Tourist Hunting Regulations. Operators are required to submit three-year reports to the Wildlife Division to assess their compliance with the requirements of their leases and evaluate whether the concession lease should be renewed. A database of all hunting permits issued by (and compulsorily returned to) the Wildlife Division is used to follow-up lion trophy hunting activity and trophy skulls that must be presented to the Wildlife Division for inspection. When a permit is sought, the system deducts the number of animal hunted from the quota uploaded. The system indicates the quota balance from each animal species. In this regard, over utilization of the hunting quota issued to a company is controlled, and tracked on the harvest end through the hunt return forms. Tanzania also requires that a government ranger must observe all longer safaris for the larger species.
5	**Produces reliable and periodic documentation of its biological sustainability and conservation benefits (if this is not already produced by existing reporting mechanisms).**	The Wildlife Subsector Statistical Bulletin is published every three years and contains important information on conservation activities of the Wildlife Division including Hunting. TAWIRI produces regularly scientific reports and NDFs. Reporting to CITES is done periodically.

Accountable and Effective Governance

A trophy hunting programme can serve as a conservation tool when it:

#	Principle	Remarks
1	**Is subject to a governance structure that clearly allocates management responsibilities**	Tanzania's governance structure is described in the Wildlife Conservation Act No.5 of 2009 and its subsidiary regulations that clearly provides for Institutional arrangements and administration defining the management responsibilities within the relevant Government Authority.
2	**Accounts for revenues in a transparent manner and distributes net revenues to conservation and community beneficiaries according to properly agreed decisions;**	The Wildlife Policy stresses the need for equitable distribution of costs and benefits that considers stakeholders' role in relation to categories of land and efforts invested by the institution in conservation within WMAs. The improvement of benefit sharing arrangements as an incentive to local Communities to conserve wildlife is taking place. Governmental institutions such as TPWF distribute revenues to conservation and community beneficiaries and supports infrastructure development and direct cost for carrying anti-poaching activities in Zonal Anti-Poaching Units (ZAPUs). As a mechanism of

		providing incentives to the communities in districts that participate in wildlife conservation, TWPF supports community development projects such as building of schools upon screening of submitted proposals based on the stipulated criteria in TWPF guidelines for funding. Safari operators contribute substantially and voluntarily, above the prescribed fixed contribution, to Tanzania's enhanced anti-poaching efforts and communities' development. They provide funding, equipment and the technical expertise for repairs, transportation, and most critically, funding for government game scouts as well as their own anti-poaching patrols. Hunting Companies' anti-poaching teams acting in collaboration with the Wildlife Division Anti-Poaching Units, remove snares, prevent illegal logging, and arrest poachers in a coordinated and continuous effort.
3	**Takes all necessary steps to eliminate corruption;**	Several legislations and initiatives are in force in Tanzania to combat corruption including: Prevention and Combating of Corruption Act No. 11 of 2007 The Public Procurement Act, Act 21 of 2004 The Public Services Act, Act 8 of 2002 The Public Finance Act, 2001 The Ethical Codes for Public Officials The 2016 Anti- Corruption Summit was hosted by the British Prime Minister, David Cameron and was held on 12th May, 2016 in London-UK to set up global action to expose, to punish and to drive out corruption in all walks of life. The Summit stirred up the global response in tackling corruption by jointly agreeing to deal with corruption across borders. Among African Heads of state invited was President of the United Republic of Tanzania Dr. John Pombe Magufuli who was represented by the Tanzania Prime Minister, Kassim Majaliwa. The Tanzania Prime Minister presented country Anti-Corruption Commitments and urged that Corruption is a serious crime that needs concerted efforts.
4	**Ensures compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.**	The CITES Management Authority of Tanzania, the MNRT Wildlife Division, ensures compliance of safari hunting to CITES provisions.

APPENDIX 2 - Reference Table to the USFWS Letter and Questionnaire on Lion in Tanzania

The attached table cross-references the sections of the Enhancement and Non-Detriment Findings with the questionnaire directed to the Wildlife Division from the USFWS, dated 15 April 2016.

Question	Responded to in Section(s)
I. OVERVIEW *The lion is listed in Appendix II of CITES. As such, the Scientific Authority of the exporting country must make a determination that the export of a sport-hunted trophy will not be detrimental to the survival of the species (Article III, 2(a)). While the finding that the U.S. Fish and Wildlife Service must go beyond the "Non-detriment" standard, it would be very beneficial to our review if you could provide a copy of a recent "Non-detriment" finding made by your Scientific Authority.*	
II. MANAGEMENT PLAN (a comprehensive plan addressing specific management goals or actions) *1. Does Tanzania currently have a national management plan for lions and, if so, could you please provide a copy? If there is no national plan, have regional plans been developed and adopted, and if so, could you please provide copies?*	8.1.
2. Is your agency the only government agency that is responsible for managing lions within your country? If not, which other agency or organization within your national, regional, or local government is responsible?	8.1
3. Have you developed a mechanism (i.e., adaptive management approach) for implementing the plan(s) and determining its effectiveness? Could you describe how implementation of the plan is progressing and if there are management or logistical problems that still need to be addressed?	8.1
4. Are there any other management plans or conservation plans that contribute to or interact with the lion management plan(s) (i.e., regional plans, hunting concession plans)?	8.1
III. POPULATION STATUS *1. What is the status of lion populations within your country (e.g., population numbers; population trends; sex and age classification)?*	3
2. Do you have a standardized process to conduct population censuses? If so, how often? What areas are censused? Do they include all hunting areas? What is the censusing methodology?	3
3. What is the current distribution of lions within your country (i.e., widespread, environmentally confined to specific areas, confined to national or regional protected areas)?	2 and subsections
4. Even with protection activities and legal intervention, poaching could still occur. Do you have any estimates on the number of specimens lost to illegal killing annually?	9 and subsections
5. What impact are human-lion conflicts having on local or national populations? Is there a standardized national policy to address such conflicts and problem lion control? If so, does this policy include culling of surplus animals and removal of nuisance animals? Is there domestic harvesting of lions for local consumption or use?	9.1

IV. CONSERVATION AND MANAGEMENT *1. Please describe potential threats to the species, such as poaching and human-animal conflicts, and how these threats are being addressed.*	9 and subsections
2. Is your agency currently conducting any research efforts addressing conservation issues involving lions? What about other agencies or departments within your national or regional governments and what are their roles? Are you aware of any NGO projects currently underway that involve lion conservation or management? If so, could you describe such projects or provide contact information to the organization carrying out the work?	3, 4.1
V. HUNTING POLICIES/REGULATIONS *1. Please describe how lion hunting program functions within your country. Specifically, do you have an established national/regional hunting quota? How is this quota determined? Many countries have established age restrictions on harvesting lions. Has your country established such age restrictions and, if so, what are they and how are they implemented?*	5 and subsections 6 and subsections 7 and subsections
2. What format do you use to manage sport hunting (i.e., establishment of national districts under government control, awarding hunting concessions to privately owned operations)?	5 and subsections 6 and subsections
3. If hunting areas/concessions allocated to safari outfitters, how are they allocated? What requirements have been established for the concession holders (i.e., mandatory census activities, assistance to local villages, etc.)? Are concessions awarded on an annual basis or for longer periods? If concession areas are centrally controlled by your government (e.g., several outfitters hunt in the same areas and no one outfitter is responsible for overall management), what mechanism is used to monitor and control outfitter activities?	5 and subsections 6 and subsections
4. How much do hunting licenses cost foreign hunters? How does your government utilize this revenue? Does a percentage go directly to lion conservation efforts or into more general wildlife management efforts? If so, what percentage is allocated to each? Is any of this revenue provided to local communities? If so, what percentage?	11 and subsections 10 and subsections
5. How does the sport-hunting program provide any other tangible benefits, besides revenue, to local communities (i.e., increase employment, jobs in anti-poaching units)?	5 and subsections 10 and subsections

Harcum, Heather <heather_harcum@fws.gov>

Import of Sport-Hunted Lion PRT#82925C

1 message

Harcum, Heather <heather_harcum@fws.gov> Mon, Dec 23, 2019 at 11:58 AM
To: Rachel Brechbuehler <permits@conservationforce.org>

Good morning Emma,

I wanted to follow up on our phone conversation about Mr. John S. Wright's application, PRT # 82925C. Mr. Wright applied for this permit in March 2018 for a hunt that was supposed to take place in August 2019. I want to confirm whether this hunt was successful for him or not.

Please let me know once you receive this information from Mr. Wright.

Thank you,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Re: [EXTERNAL] Import of Sport-Hunted Lion PRT#82925C (Applicant: John Wright)

Harcum, Heather L <heather_harcum@fws.gov>
Wed 2/12/2020 11:22 AM
To: Tammy Piker <permits@conservationforce.org>

Thank you, Tammy.

We will go ahead and withdraw the applicaon.

Best regards,
Heather Harcum

From: Tammy Piker <permits@conserva onforce.org>
Sent: Wednesday, February 12, 2020 10:40 AM
To: Harcum, Heather L <heather_harcum@fws.gov>
Subject: [EXTERNAL] Import of Sport-Hunted Lion PRT#82925C (Applicant: John Wright)

Good morning Heather: Still going through old emails of Emma's, so please forgive the lateness of this reply.
I have determined (by reading email strings below) that Mr. Wright DID NOT take his lion for the hunt specified in his application due to the fact that the lion was too young and was still holding a pride. I do not know if there is any other information needed to withdraw his application, or some specific form that I should be using but if so, please let me know.

Regards,
Tammy L. Piker
Conservation Permitting Division
CONSERVATION FORCE
P.O. Box 278
Metairie, LA 70004-02781
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org.

> On December 23, 2019 at 10:58 AM "Harcum, Heather" <heather_harcum@fws.gov> wrote:
>
> Good morning Emma,
>
> I wanted to follow up on our phone conversation about Mr. John S. Wright's application, PRT # 82925C. Mr. Wright applied for this permit in March 2018 for a hunt that was supposed to take place in August 2019. I want to confirm whether this hunt was successful for him or not.

Please let me know once you receive this information from Mr. Wright.

Thank you,
Heather Harcum

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Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

DETERMINED
www.CITES.org

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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March 4, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 15 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find three applications to import sport-hunted lion trophies. The first applicant is hunting in South Africa, at Khamab Kalahari Game Reserve, an area that has been designated to have "wild" lion by South Africa's Department of Environmental Affairs. Please refer to the attached list and information in the DMA's files, which includes the management plan for this reserve. The applicant is lawfully hunting a lioness as a population control measure, as explained in the attached justification. Please consider that information and the information previously submitted by South Africa's DEA and Conservation Force in making a positive enhancement finding for this applicant.

The second applicant is hunting in Tanzania with Rungwa Safaris/Bundu Safaris. This operator has submitted an enhancement report, which was sent to the DMA in October 2016 and is attached for ease of reference. Please consider that information and the information previously submitted by Tanzania's Ministry of Natural Resources and Tourism/Wildlife Division/Tanzania Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

The third applicant is hunting in Zimbabwe in the Dande South concession. This concession incorporates extensive anti-poaching and community investment. We will shortly submit an enhancement report from this operator. Please consider that information and the information previously submitted by Zimbabwe's Parks and Wildlife Management Authority, Conservation Force, and others in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationfo

(b) (6)

Name: Julian A. Sullivan

Date: 02/06/2018

Department of the Interior
U.S. Fish and Wildlife Service

MAR 15 2018

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c Middle name or initial	1.d. Suffix
Sullivan	Julian	Allen	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Madison	Alabama	35758	Madison	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Bontebok MA24105C-0 No ☐

(b) (6)

13 of the Code of Federal Regulations and the other application for a permit is complete and accurate to the penalties of 18 U.S.C. 1001.

20 Feb 2018
Date of signature (mm/dd/yyyy)

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo melanochaita

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe, Dande South

   b. Date wildlife is to be hunted:

      12 - 24 September 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      skin, skull, teeth, claws -- all parts for life-sized mount

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Name: Anthony Crick
Business Name:	Business Name: HHK Safaris (Pvt) Ltd
Address:	Address: 4 Wayhill Lane West,
Address:	Address: Umwinsidale,
City:	City: Harare
State/Province:	State/Province: Mashonaland Central
Country, Postal Code:	Country, Postal Code: 0000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data, how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one [redacted] into the United States, cann[redacted]

App[redacted] te: 20 Feb 2018

Be a[redacted] or state government, as well [redacted] activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, II (b) (6)

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

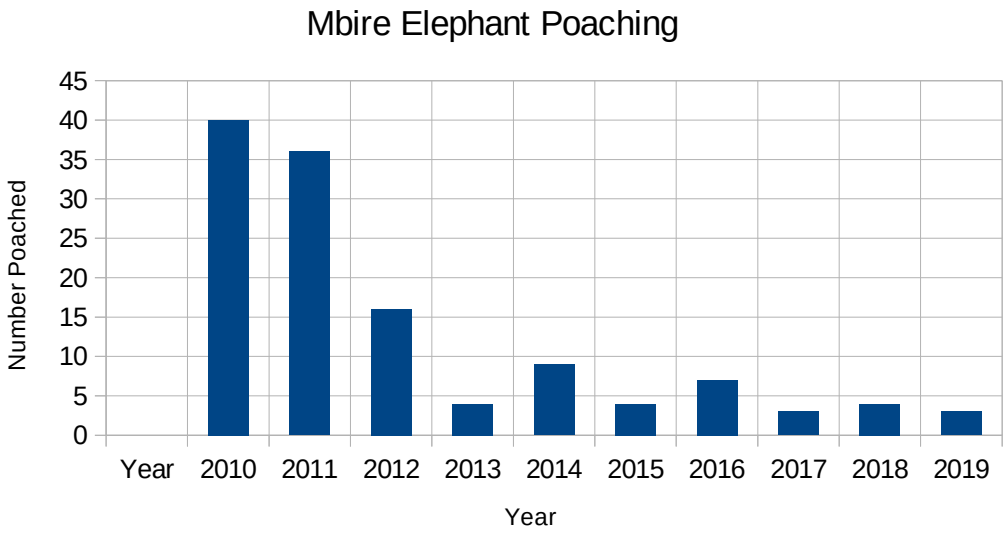


Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

MAR 2 3 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LIMMER	SCOTT	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			b (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LAPORTE	COLORADO	80535	LARIMER	USA
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Si (b) (6) ocopied or stamped signatures) Date of signature (mm/dd/yyyy)

03/12/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   SAME AS PAGE 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   SCOTT A. LIMMER (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      Panthera leo melanochaita or African Lion.
   b. Sex (if known).
      MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
      ZIMBABWE, MOKORE and UMKONDO RANCHES, SAVE VALLEY CONSERVANCY, BIKITA DISTRICT, MASVINGO PROVINCE, SOUTHEAST LOWVELD. Near cities of MASVINGO and MUTARE. CAMP GIS Coordinates S 20 24' 12.01" E 032 07 01.88"

   b. Date wildlife is to be hunted:
      APRIL 6-26, 2019 or July 1-21, 2020.

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
      MOKORE SAFARIS
      7 STABLE CLOSE
      BORROWDALE
      HARARE, ZIMBABWE
      GARY DUCKWORTH - LIC# 96 Email: garyduckworth@mokore.com
      NEIL DUCKWORTH - LIC# 94 Email: neilduckworth@mokore.com

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

      N/A

   b. Date wildlife was hunted:

      N/A

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NONE YET - HUNT IS IN 2019.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: CUAN MEREDITH
Business Name: TROPHY CONSULTANTS INTERNATIONAL
Address: 4 JOSIAH CHINAMANO ROAD, BELMONT
City: BULAWAYO
State/Province: MATABELELAND
Country, Postal Code: ZIMBABWE

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Also See attached. Considering species such as Lion, which are trophy hunted in the SVC, it is clear that hunting has aided the conservation of this species (Groom 2012). Population trends show a steady increase in Lion within the SVC from 40 in 2005 to 284 in 2015. Annual predator spoor surveys and aerial surveys show a Lion increase of 710% since 2005.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Also See attached. Trophy Fee for Lion is $15,000 of which 85% ($12,750) goes to Bikita Rural District Council. I will pay $2100 for a Zim Parks Ranger to be on the Lion hunt, a $2700 levy on Lion trophy fee and daily rate, and a $420 conservation levy. In addition, I will take some Plains Game species and pay trophy and levy fees on those animals. I will pay daily rate of $2500, some of which will fund anti-poaching patrols and water projects.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

Also See attached. In the area I will hunt, Mokore annually spends $60,000 for an 8-man anti-poaching team; $4000 in rewards to community members that turn in traps, snares, guns, and poachers; $10,000 in local village projects; $5500 for pumping water for wildlife; and a large lease fee to the Bikita Council for an adjacent area. Strict lion aging criteria is followed with a $10,000 fine to PH for lions harvested under five (5) years old. Please see enclosures.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import tw

Applicant's signa (b) (6) _____ Date: 03/12/2018

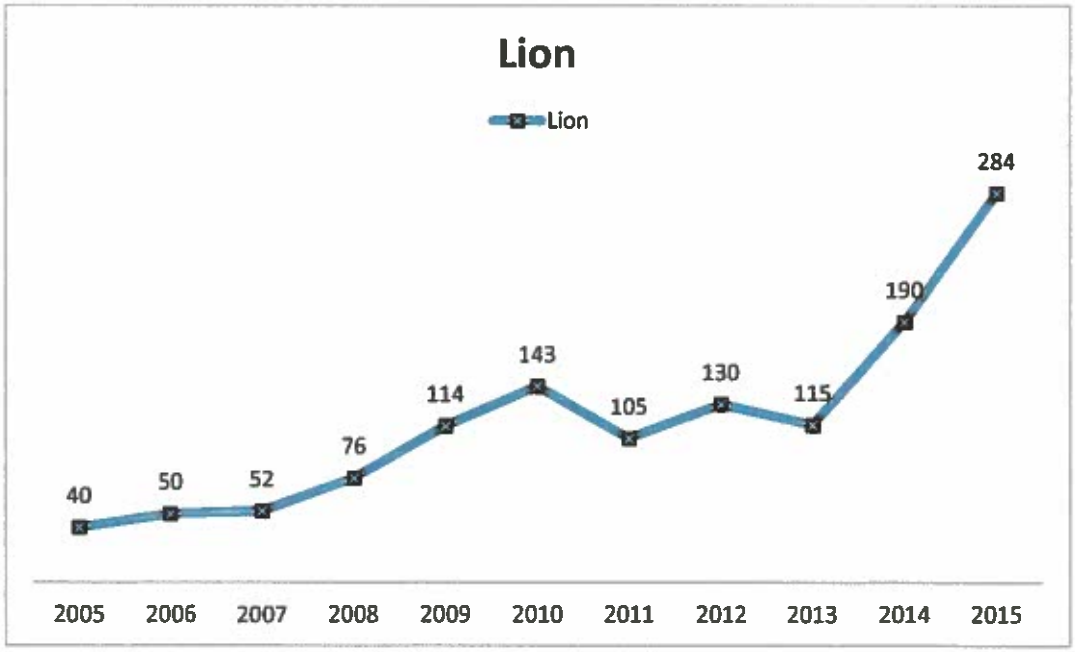
Be aware that there may s by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SVC Predators 2015 Attached for 9a

When considering species such as Lion, Leopard and Spotted Hyena, all which are Trophy hunted within the SVC, it is clear that hunting has aided the conservation of these species (Groom 2012). Population trends below show slight fluctuation and a steady increase of Lion and Leopard within the SVC. *The recent decrease in Spotted Hyena numbers can be contributed to a rapid increase in lion numbers and species competition.* Further details can be seen in *Lion Hunting in Zimbabwe's Savé Valley Conservancy, A Conservation Success Story, Dr Rosemary Groom, African Wildlife Conservation Fund.*

Populations of Lion (*Panthera leo*) , Leopard (*Panthera pardus*) and Spotted Hyena (*Crocuta crocuta*) can be depicted as follows:



iage 1: Population trends for Lion of the SVC from 2005 to 2015.

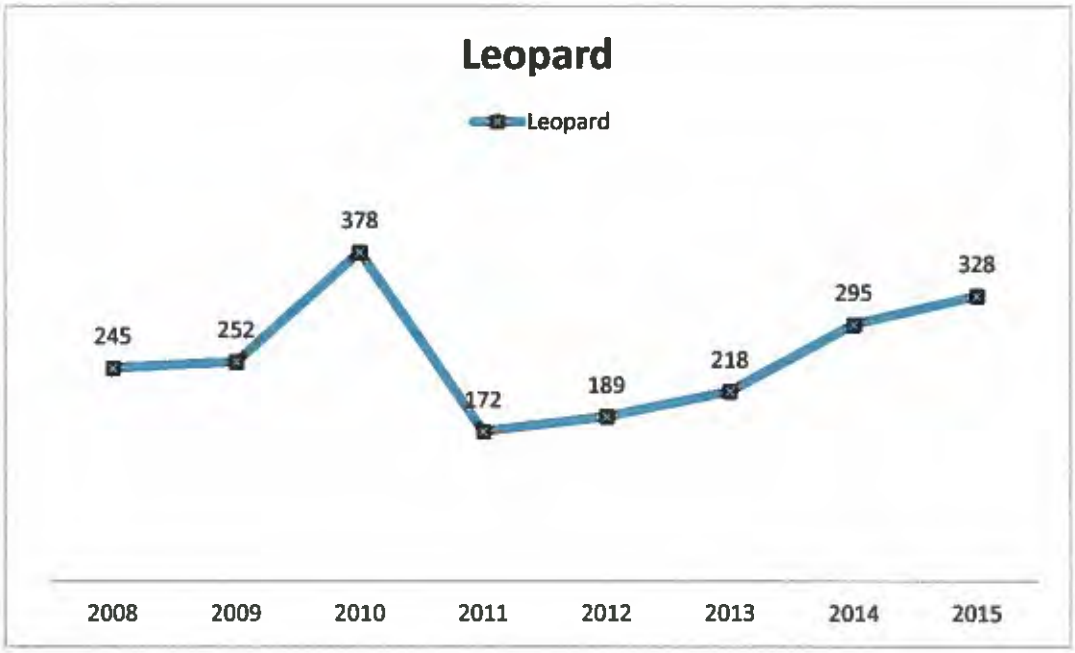
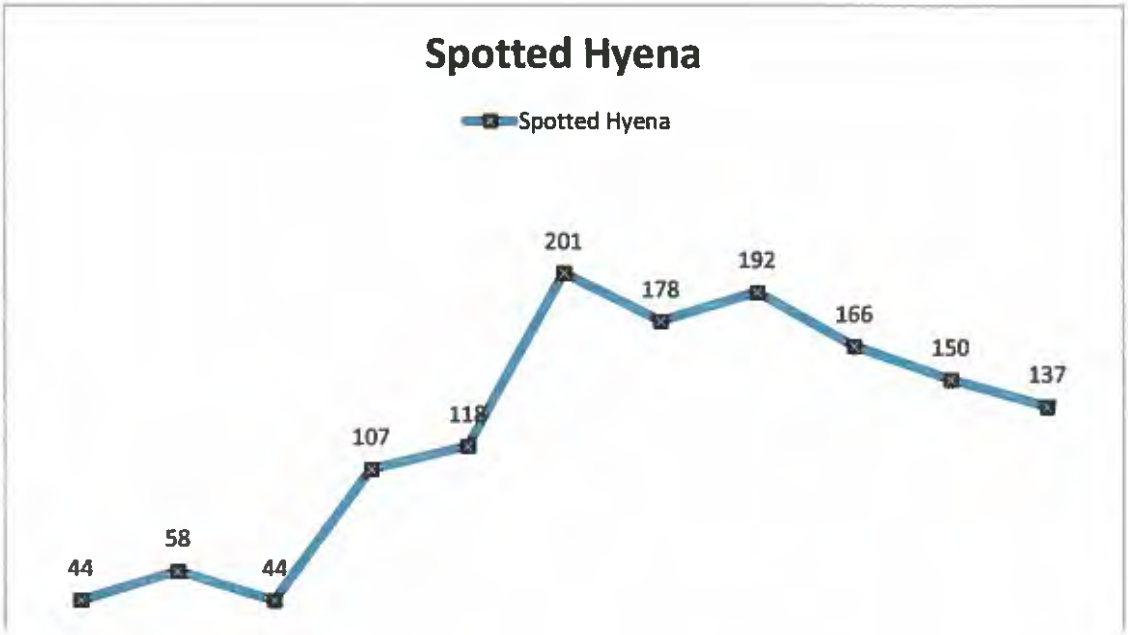


Image 2: Population trends of Leopard for the SVc from 2008 to 2015.



See page #3.

For 9a.

African Wildlife Conservation Fund

Savé Valley CONSERVANCY

Carnivore Densities in the Savé Valley Conservancy

Results of the 2015 Spoor Survey & Wild Dog Monitoring Project

Dr Rosemary Groom and Jessica Watermeyer, African Wildlife Conservation Fund

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of the carnivores in the Savé Valley Conservancy (SVC / the conservancy) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer.

Spoor surveys have been shown to be an effective and efficient means to assess wildlife densities (Stander 1998; Funston et al. 2001; Davidson & Romañach 2007; Funston et al 2010) as there is a strong correlation between spoor density and true density. The technique is considered to produce reliable estimates for lions, spotted hyenas, and leopards, when sample sizes (spoor encounter rates) are sufficient. Other carnivores are included in our counts simply to monitor trends over time.

This report presents the results of the October 2015 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.

Part of the AWCF team during the 2015 spoor survey

Methodology

The 2015 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romanach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km^2 of sample area, 1km of transect was surveyed, creating a penetration density (expressed as a ratio of kilometres of transect surveyed to total sample area) of between 1:6 and 1:7.

The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 258.6km, giving a penetration ratio of 6.34. In southern SVC, the combined transect length was 131.3km, giving a penetration ratio of 6.09. For the conservancy as a whole, 389.9km were driven (penetration ratio 6.26).

Transects surveyed were the same as those used in 2007, 2008, 2009, 2010, 2011, 2012, 2013 and 2014 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Bote, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.6 km and 29.8 km in length, with a mean transect length of 21.7 km.

Each transect survey started as close to sunrise as possible, and wherever feasible was driven from west to east to ensure the best possible tracking conditions. Only tracks less than 24 hours old were counted. Road conditions are generally sandy, such that spoor is relatively easy to see. Where possible, spoor of individual animals were followed to reduce the likelihood of that individual being counted twice on a given transect. Spoor was recorded for all mammalian carnivores bigger than a genet.

Figure 1: Map of the transects driven – October 2015

Results

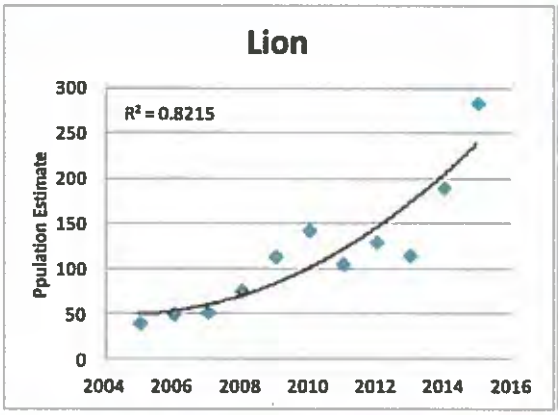
Table 1: Summary of survey parameters (2015)

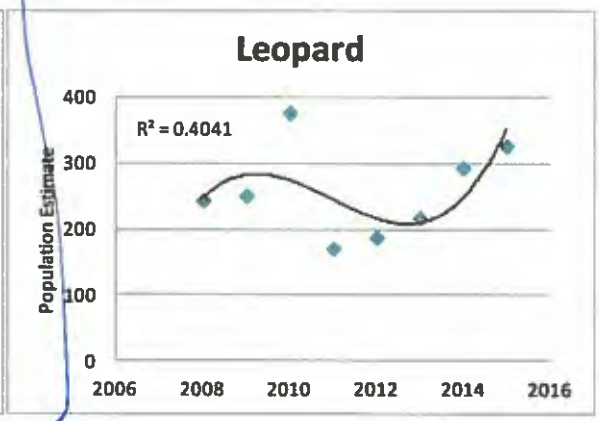
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	258.6	131.3	389.9
Penetration ratio	6.34	6.09	6.26

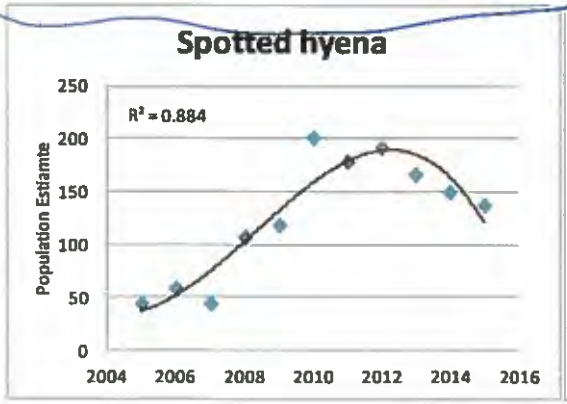
Comparison with previous years

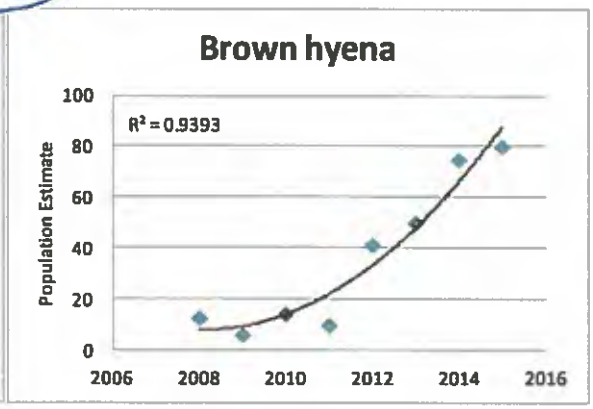
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2015 (from 2005 – 2015 for lion and spotted hyena). Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts.

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Lion	40	50	52	76	114	143	105	130	115	182	284
Leopard				245	252	378	172	189	218	283	328
Spotted hyena	44	58	44	107	118	201	178	192	166	144	137
Brown hyena				12	6	14	10	41	50	72	80
African Wild dog				45	60	64	61	86	90	84	91
Black backed jackal				188	190	157	141	151	199	219	241









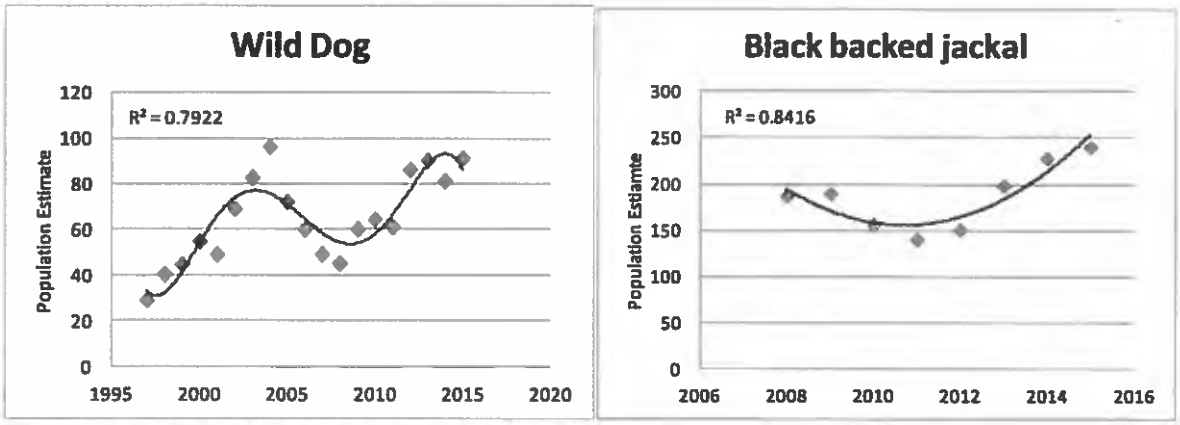


Figure 3: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts. *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

When looking at the graphs, the trend for each species is clear. **The results show a steady increase in all species except spotted hyena, which continue to decline, and African wild dogs which appear to be levelling off.**

Interpretation of results for each species

The **lion population** has increased substantially in the last two years, and there are now an estimated **284 lions** in the whole of the conservancy. This is a notable increase since 2013's estimate of 115 lions and 2014's estimate of 182, and is perhaps a latent effect of no hunting for over several years. However, of the 149 lion tracks we encountered, only 28% were big adult males, with 53% identified as females/juveniles and 15% as young cubs (3% of tracks were unidentified). The number of lions in SVC equates to a **density of 11.7 lions / 100km²**. This is slightly higher than other population estimates of 9.6 lions / 100km² (average over Kruger, Hwange, Selous and Serengeti). With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

The conservancy's **leopard population** is steadily increasing after a significant drop in numbers in 2011, and there are now an estimated **328 leopards** in the conservancy at a **density of 13.5 leopards / 100km²**. This is higher than that recorded in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (7.8 / 100km²; Groom & Watermeyer 2015. Derivation of population estimates from spoor densities is controversial for leopards (there are several different equations available which give different numbers) so the numbers themselves should be treated with caution, although the trend is clear. In addition, from the leopard tracks we encountered we picked up a female bias of two females for every male. This should be considered when determining suitable quotas.

Spotted hyenas are the only species to display a declining population trend, from an estimated peak of 192 spotted hyena in 2012 to only **137 spotted hyenas** this year. This translates to a density of **5.6 spotted hyenas / 100km²**, which is significantly lower than other populations (13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992) and 13.5 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2015). This decline could be a result of a number of factors, including prey availability, intra-specific competition, hunting pressure, anthropogenic mortality etc. One should also not overlook the possibility of increasing levels of conflict on the conservancy boundary (many cases of which most likely are unrecorded) which may be starting to have an impact on the population growth rate. **If the population continues to decline, attention must be paid to the potential causes.**

The conservancy's **brown hyena** population continues to show a steady increase. There is now an estimated **80 brown hyena** in the conservancy at a density of **3.3 brown hyenas / 100km²**. Anecdotal evidence (sightings, den sites found etc.) also suggests an increase of brown hyena.

African wild dogs appear to be levelling off, after a population increase following a period of decline. **From our comprehensive and direct monitoring of the species, there are 91 adult and yearling wild dogs in the conservancy (3.7 wild dogs / 100km²)**, with a potential additional 8 adult wild dogs in 3 breakaway/dispersal groups. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 247 wild dogs in the conservancy, but, when counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, spoor surveys are not an ideal tool to measure wild dog numbers because the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey can have a large effect on the results (can usually more than double actual counts).
The long term trends for this species are as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time. The trend for the species over the last three years, and considering the full historical trend, indicates that we may be in for a population 'bust' or dip; particularly when one considers the increasing lion population (key competing predator) and that the wild dogs may begin to roam outside the boundaries of the conservancy in search of more space/to disperse and thus may more frequently encounter deadly edge effects.

Black backed jackals are increasing after a population dip between 2010 and 2012. There is currently an estimated **240 black backed jackals** in the conservancy at a **density of 9.9 black backed jackals / 100km²**.

Data from the spoor survey suggests there to be **six cheetahs** in the whole conservancy at a **density of 0.2 cheetahs / 100 km²**. This is low compared to an average estimate of 1.0 cheetah / 100km² (IUCN/SSC 2009). Although anecdotal evidence suggests the population may be picking up slightly, we can safely say the population is still very low. Even if accurate population estimates cannot be obtained; only three cheetah tracks were seen in the 389.9km of transects driven. However, spoor surveys are not really appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. **The Cheetah Conservation Project Zimbabwe, which has been collecting photographs of cheetah throughout Zimbabwe, and identifying individuals, estimates c. 10 adult cheetahs in SVC (Esther van der Meer, pers comm).**

Word of caution

When interpreting the results in the graphs and tables at the end, please do so with caution, especially to quote specific numbers. For lions and hyenas we are confident that these spoor surveys are relatively accurate in the numbers they predict. Likewise we can trust the numbers for wild dogs, which are from the detailed population monitoring study. For leopards however, while the trends are clear, several different equations (all considered suitable for estimating leopard numbers from spoor) give very different population estimates from each other. The spoor survey technique has not been calibrated for species like jackals, civets, even brown hyenas, so while the data is useful for looking at trends, taking population figures off the graphs for these species is unadvisable.

We would also like to draw attention and slight caution to the fact that we did not pick up a signal African wild cat track for the duration of the survey. Previous results estimated 13 African wild cats in 2014 and nine in 2013.

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. & Kruiper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP.*

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs Lycaon pictus in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. (1998) Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Groom, R. & Watermeyer, J. 2015. Carnivore Densities in Gonarezhou National Park: Results of the 2015 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority

Acknowledgements

Permission to conduct this research was given by the Research Council of Zimbabwe, with the support of the Zimbabwe Parks and Wildlife Management Authority. The project is hosted by Chishakwe Ranch, and all the work undertaken is thanks to their generosity in providing accommodation and logistical support. Thanks also to all of the landowners and managers in the conservancy for allowing us to conduct this spoor survey on their properties. Rueben Bote deserves special mention for help with spotting and track identification. Funding was provided by Disney Worldwide Conservation Fund, National Geographic Conservation Trust and Columbus Zoo.

Appendix 1: All Spoor Survey Results for All Species Counted (2015)

NORTH SVC Species	Survey Area North SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	1639	150.6929304	Leopard (Y=0.6993X)	9.194199536	258.6	34	7.605882353	258.6	6.337973705	13.14771848
Brown hyaena	1639	63.77079002	Lion (Y=0.3049X)	3.890835267	258.6	33	7.836363636	258.6	6.337973705	12.76102088
Cheetah	1639	5.797344548	Lion (Y=0.3049X)	0.353712297	258.6	3	86.2	258.6	6.337973705	1.160092807
Civet	1639	655.9574617	Leopard (Y=0.6993X)	40.02180974	258.6	148	1.747297297	258.6	6.337973705	57.23124517
Honey Badger	1639	93.07504524	Leopard (Y=0.6993X)	5.678770302	258.6	21	12.31428571	258.6	6.337973705	8.120649652
Leopard	1639	226.0393956	Leopard (Y=0.6993X)	13.7912993	258.6	51	5.070588235	258.6	6.337973705	19.72157773
Lion	1639	187.4474737	Lion (Y=0.3049X)	11.4366976	258.6	97	2.665979381	258.6	6.337973705	37.50966744
Spotted hyaena	1639	85.02772003	Lion (Y=0.3049X)	5.187780356	258.6	44	5.877272727	258.6	6.337973705	17.01469451
African wild dog	1639	179.717681	Lion (Y=0.3049X)	10.96508121	258.6	93	2.780645161	258.6	6.337973705	35.96287703
African Wildcat	1639	0	Leopard (Y=0.6993X)	0	258.6	0		258.6	6.337973705	0

SOUTH SVC Species	Survey Area South SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	800.57	89.54006566	Leopard (Y=0.6993X)	11.18453922	131.3	21	6.252380952	131.3	6.097258187	15.99390708
Brown hyaena	800.57	16.73148619	Lion (Y=0.3049X)	2.089946687	131.3	9	14.58888889	131.3	6.097258187	6.854531607
Cheetah	800.57	0	Lion (Y=0.3049X)	0	131.3	0		131.3	6.097258187	0
Civet	800.57	315.5221361	Leopard (Y=0.6993X)	39.41218583	131.3	74	1.774324324	131.3	6.097258187	56.3594821
Honey Badger	800.57	34.1105012	Leopard (Y=0.6993X)	4.260776847	131.3	8		131.3	6.097258187	6.092916984
Leopard	800.57	102.3315036	Leopard (Y=0.6993X)	12.78233054	131.3	24	5.470833333	131.3	6.097258187	18.27875095
Lion	800.57	96.67080911	Lion (Y=0.3049X)	12.07524752	131.3	52	2.525	131.3	6.097258187	39.6039604
Spotted hyaena	800.57	52.0535126	Lion (Y=0.3049X)	6.502056359	131.3	28	4.689285714	131.3	6.097258187	21.32520944
African wild dog	800.57	68.78499879	Lion (Y=0.3049X)	8.592003046	131.3	37	3.548648649	131.3	6.097258187	28.17974105
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	131.3	0		131.3	6.097258187	0

TOTAL SVC Species	Survey Area Total SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	2439	240.5939946	Leopard (Y=0.6993X)	9.864452424	389.9	55	7.089090909	389.9	6.255450115	14.10618107
Brown hyaena	2439	80.10604309	Lion (Y=0.3049X)	3.28438061	389.9	42	9.283333333	389.9	6.255450115	10.77199282
Cheetah	2439	5.721860221	Lion (Y=0.3049X)	0.234598615	389.9	3	129.9666667	389.9	6.255450115	0.769428058
Civet	2439	971.124851	Leopard (Y=0.6993X)	39.81651706	389.9	222	1.756306306	389.9	6.255450115	56.93767633
Honey Badger	2439	126.8586517	Leopard (Y=0.6993X)	5.201256732	389.9	29	13.44482759	389.9	6.255450115	7.437804565
Leopard	2439	328.0827199	Leopard (Y=0.6993X)	13.45152603	389.9	75	5.198666667	389.9	6.255450115	19.23570146
Lion	2439	284.1857243	Lion (Y=0.3049X)	11.65173121	389.9	149	2.616778523	389.9	6.255450115	38.2149269
Spotted hyaena	2439	137.3246453	Lion (Y=0.3049X)	5.630366761	389.9	72	5.415277778	389.9	6.255450115	18.4662734
African wild dog	2439	247.9472762	Lion (Y=0.3049X)	10.16593998	389.9	130	2.999230769	389.9	6.255450115	33.34188253
African Wildcat	2439	0	Leopard (Y=0.6993X)	0	389.9	0		389.9	6.255450115	0

IUCN April 2016 Briefing Paper

Case Study 4

Private wildlife lands in Zimbabwe

In Zimbabwe, the devolution of wildlife use rights to landholders in 1975 resulted in a transition from game ranching being a hobby practiced by a few dozen ranchers to some 1,000 landowners and 27,000 km² conserving wildlife by 2,000, with trophy hunting a primary driver of this change (Child, 2009; Lindsey et al., 2009). Although these numbers have declined significantly under the land reform programme, and despite the current challenging economic conditions in the country, some private conservancies continue to play a crucial role in conservation. The following all rely on trophy hunting as the primary source of revenue and they would all be unviable without it; photographic tourism has been tried and has not been a viable alternative.

The Savé Valley Conservancy (SVC), covering 344,000 ha, was created in the 1990s by livestock ranchers who agreed that wildlife management could be a better use of the land than livestock. Cattle ranching operations had eliminated all elephants, rhinos, buffalo and lions, among other species, in the area. Today, SVC has around 1,500 African Elephants, 117 Black Rhinos and 43 White Rhinos, 280 Lions and several packs of the Endangered African Wild Dog. Hunting on the Sango Ranch, SVC's largest property, yields around US$600,000 annually and employs 120 permanent workers who represent more than 1,000 family members (Lindsey et al., 2008; W. Pabst and D. Goosen, pers. comm.; SVC, n.d.; Sango Wildlife; n.d.).

The 323,000-ha Bubye Valley Conservancy (BVC) was converted from a cattle ranch 20 years ago and now has roughly 500 Lions, 700 African Elephants, 5,000 African Buffalo, 79 White Rhinos and, at 202, the third largest Black Rhino population in Africa (see Figure 3). Trophy fees in 2015 generated US$1,380,605. BVC employs approximately 400 people and invests US$200,000 annually in community development projects (BVC, n.d.; B. Leathem, pers. comm.).

The Cawston Game Ranch in Zimbabwe, at 12,600 ha, is much smaller than SVC and Bubye, and thus is more limited in terms of game species it can harbor. When the ranch was purchased a few native game species existed but Common Wildebeest, Plains Zebra, Giraffe, Tsessebe, Common Impala, Bushbuck, Red Hartebeest, Gemsbuck and Waterbuck had to be reintroduced. Approximately 4,500 game animals now inhabit the ranch. Large predators are limited to Leopards, Brown Hyaenas and an occasional Cheetah. Hunting contributes 68% of gross revenues, derived almost wholly from plains game, particularly Sable and Tsessebe. The ranch employs 41 people and its value to local communities is estimated at US$60,000/yr (V. Booth, unpublished data).

Attached for 9a.

Image courtesy of Wildscreen Exchange, www.wildscreenexchange.org

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

For 96.

ZIMBABWE

No. of Days	Description of Safari	US$
5 day	Non-trophy Buffalo Package (Below 34" and Non-exportable)	$8,500 Package
5 day	Non-trophy Buffalo Package (Below 34" and Exportable)	$9,500 Package
7 day	Plains game Mokore	1x1 - $550/Day
7 day	Plains game Mokore(2 Clients per 1 Pro-Hunter)	2x1 - 500 each/Day
7 day	Plains game Mokore Bowhunt	1x1 - $500/Day
7 day	Plains game Mokore Bowhunt (2 Clients per 1 Pro-Hunter)	2x1 - $450 each/Day
7 day	Plains game Mokore Bowhunt (3 Clients per Pro-hunter)	3x1 - $400 each/Day
7 day	Plains game Sengwa	1x1 - $750/Day
7 day	Plains game Sengwa (2 Clients per 1 Pro-Hunter)	2x1 - 700 each/Day
7 day	Non-trophy Elephant (Cow, Non-exportable)	$12,000 Package
7 day	Hippo/Crocodile	1x1 - $1,300/Day
10 day	Sable/Plains game	1x1 - $1,000/Day
10 day	Tuskless Elephant/Plains game	1x1 - $1,000/Day
12 day	Tuskless Elephant/Buffalo/Plains game	1x1 - $1,300/Day
10 day	Buffalo/Plains game	1x1 - $1,300/Day
10 day	Buffalo/Plains game (2 clients per Pro-Hunter)	2x1 - $1,250 each/Day
15 day	Leopard/Plains game	1x1 - $1,500/Day
15 day	Buffalo/Sable/Plains game	1x1 - $1,300/Day
15 day	Buffalo/Leopard/Plains game	1x1 - $1,750/Day
18 day	Buffalo/Leopard/Sable/Plains game	1x1 - $1,750/Day
12 day	Elephant/Plains game Mokore	1x1 - $ 1,500/Day
12 day	Elephant/Plains game Sengwa	1x1 - $1,000/Day
15 day	Elephant/Buffalo/Plains game	1x1 - $1,500/Day
21 day	Lion/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - $2,500/Day
28 day	Lion/Elephant/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - $2,500/Day

Observer Fees - US$250 per person per day

CITES permits for elephant, leopard and crocodile: $150 each

Pre-baiting for cat or crocodile hunts: $300 per day + bait trophy fees

Vehicle Transfers - $500 one way/vehicle

Conservation Levy - $20/person/day

4% Gov levy on total daily rates and trophy fees

All Cat or Elephant hunts on Private Land now need a Parks Ranger - $100/day that he is needed

TROPHY FEES

	US$		US$
Elephant Bull - Mokore	15,000.00	Zebra Bait (Mokore only)	500.00
Lion	15,000.00	Bushpig	500.00
Elephant Bull - Sengwa	12,500.00	Warthog	500.00
Leopard	7,500.00	Caracal	500.00
Sable	5,000.00	Antbear	450.00
Hippo	5,000.00	Honey Badger	450.00
Buffalo	5,000.00	Grysbok	375.00
Crocodile	4,500.00	Serval	350.00
Tuskless Elephant	4,000.00	Civet	300.00
Nyala	4,000.00	Duiker	290.00
***Waterbuck	2,400.00	Jackal	275.00
Buffalo Cow	2,000.00	Impala males	250.00
Eland	1,950.00	Genet	225.00

Kudu	1,950.00	Porcupine	220.00
Giraffe	1,750.00	Wildcat	100.00
Hyeana - Mokore	1,500.00	Impala females/baits	100.00
Reedbuck	1,150.00	Baboon	50.00
Zebra	950.00	Monkey	50.00
Bushbuck	950.00	Mongoose	50.00
Wildebeest	850.00	Hyrax	20.00
Hyeana - Sengwa	750.00	Guinea Fowl & Francolin	5.00
Klipspringer	700.00	Birds Miscellaneous	5.00

For 9c

Mokore Safaris (Pvt), Ltd.
7 Stable Close, Borrowdale, Harare, Zimbabwe.
Operator: Duckworth Family.
garyduckworth@mokore.com
Operating in: Save Valley Conservancy and Sengwa Research Management Area

I. DESCRIPTION OF COMPANY AND CONCESSION

Mokore Safaris has been operating in Save Valley since it's conception in late 1992. It also has been operating the the Sengwa Research Management Area since January 2013. (This is a 5 year lease with first option to roll over for a further 5 years). The Mokore Safaris section in the Save Valley is 35500 acres and provides habitat for a range of species including black and white rhino, buffalo, lion, leopard, cheetah, crocodile, wild dogs, hippo, kudu, eland, elephant, impala, bushbuck, bushpig, hyena, warthog, zebra, giraffe, waterbuck and sable (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc. Sengwa Research is 94000 acres and is home to elephant, buffalo, lion, leopard, crocodile, kudu, eland, impala, bushbuck, bushpig, hyena, warthog, zebra, reedbuck and waterbuck (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc.

Our company is family-owned and has been operating in this country since 1979. We employ three full time professional hunters, 3 part time Professional Hunters and also 48 men, 5 ladies and 2 casual labour. Altogether our operations support at least 600 dependents in local villages through our continual work on the schools, roads and dams in the neighbouring village areas. Also supplies of meat and school equipment benefits the surrounding communities.

We have a written concession plan with anti-poaching and community components....

II. ANTI-POACHING COMPONENT

Mokore Safaris maintains a 8 man anti-poaching team at an annual cost of over $60,000 in the Save Valley Conservancy and supplement Zimbabwe Parks and Wildlife Authority anti-poaching team with a vehicle driver and four rangers in the Sengwa Research Area.... Each team is equipped with a four-by-four vehicle, uniforms and boots, tents, rations, and radios. Our teams closely cooperate with the Wildlife Authority to conduct daily patrols of the concession and the neighboring properties that were taken during the land reform programme. We supply rations once a week to our scouts and assist the government game scouts in acquiring rations to ensure they are sufficiently equipped for the patrols.

We heavily patrol our areas, conducting approximately 3 patrols per day by vehicle and foot in the Save and the same again in Sengwa Research. In the past year, our teams picked up numerous snares and arrested numerous poachers hunting with dogs. Also in the Sengwa Research Area our teams with Zim Parks Rangers have arrested and also killed a number of ivory poachers. Removing snares protects the lion population by reducing incidental snaring.

We also send out road crews annually to redo the roads in the concessions, to ensure we are able to patrol effectively. These are maintained throughout the year.

In 2015, Mokore Safaris (Zimbabwe) spent approximately $100,000 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 4000 liters of diesel for patrol vehicles. We also spent $ 5500 on diesel for pumping water for wildlife in areas where there is not enough natural water for wildlife to survive. This does not include the costs of water pump and engine maintenance. And we made over $ 4000 in payments of rewards.

COMMUNITY PARTICIPATION

A. Community Assistance Component

Although there are no villages in the concession itself, we share four borders (three in Sengwa and one in Save Valley) with a heavily populated communal district. We make contributions to the two closest villages and the district council. We lease an adjacent area to the concession from the council, and pay a lease fee as well as 85% of trophy fees to the Bikita Rural District Council.

We pledge an annual contribution of at least $10,000 + in projects to the villages. We ask for a list of preferred projects at each local school and clinic. We also do the main roads annually in the Village 26, Bikita and Muchiringi Districts. We annually dredge the local dams. We supply all meat taken from any elephants harvested on our concessions to the local communities as well as supplying meat for any State Functions.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. This applies to livestock losses through predation too. We obviously try and use all means to discourage problem animals before having to take more drastic control measures.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession including over 30km of piping and 12 waterholes. We drilled, operate, and maintain two boreholes and numerous pans. Pumping costs (diesel usage only) is +-$ 5500/annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base.

V. OTHER INFORMATION

A. Prey Base

Mokore Safaris along with our other partners in the Save Valley Conservancy's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past twenty five years. Please see attached report on the game numbers increases and lion surveys report. In Sengwa research Area we estimate that our plains game (buffalo, kudu, sable, etc.) have increased by 15-20% in the last 3 years. Also, much of our anti-poaching and community assistance efforts are aimed to reduce livestock encroachment into the concession.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Save Valley Conservancy does an annual spoor survey for predators as well and an aerial survey for other species. Due to the fact that we keep tabs on the lion in our concession, we are

assured that the regulated, limited offtake is sustainable. In Sengwa Research we use trophy and age monitoring of all species hunted and manager estimates to regulate our offtakes.

C. Lion Aging Approach

Mokore Safaris has been following an age-based policy for African lion trophies since 2012, when we adopted a company rule not to harvest lion below five years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective.

D. Lion Hunting Revenue

Lion are our highest-value species. We require 21-day safaris for lion. Our daily rate is $2,500 per day, plus a trophy fee of $15000 (lion). Without this revenue plus the revenue we have already lost due the ivory import bans, our anti-poaching and habitat enhancement efforts will be seriously reduced.

E. U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

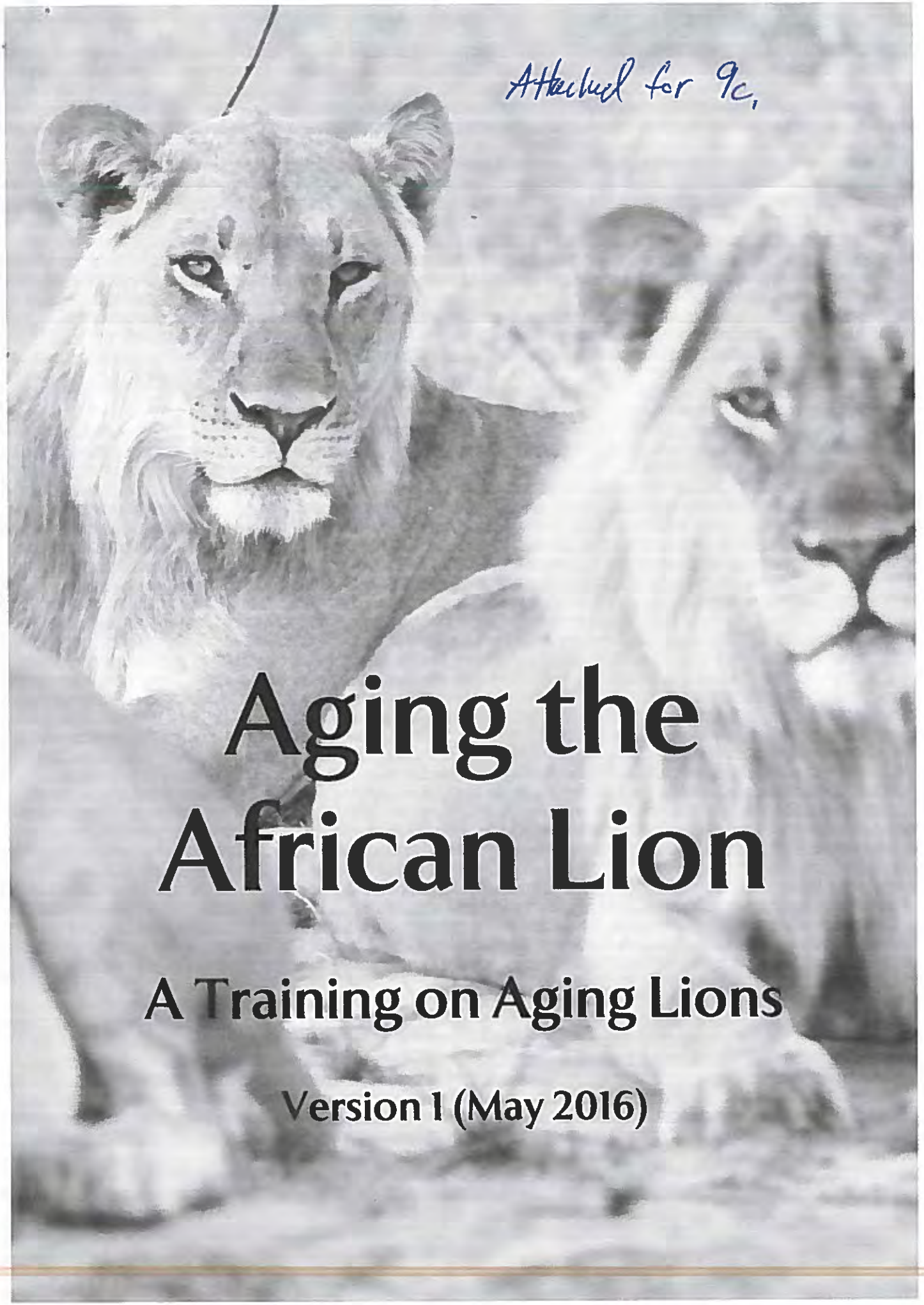
Mokore Safaris' regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

Signed: _____

Operator Name: Gary Duckworth

Title: Managing Director

Attached for 9c,



Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Authors

Jennifer R. B. Miller
Paul Funston

Citation

Miller, Jennifer R. B. and Funston, P. 2016. Aging the African Lion. Available at http://agingtheafricanlion.org.

Photo credits

Matthew Becker, Colleen Begg, Henry Brink, Alayne Cotterill, Stephanie Dolrenry, Jane Hunt, Ingela Jansson, Andrew Loveridge, David MacDonald, Craig Packer, Daniel Rosengren, Ken Stratford, Martina Trinkel, Paula White, Christiaan Winterbach and Hanlie Winterbach.

Created in Partnership with:

CHANCES for NATURE

LION LANDSCAPES

TAU Consultants

ETOSHA RAND LION CONSERVATION PROJECT

ONGAVA RESEARCH CENTRE

WILDCRU Wildlife Conservation Research Unit

EWASO LIONS

PANTHERA

Zambian CARNIVORE PROGRAMME

KOPE LION NGORONGORO

PROJECTO CARNIVOROS DO NIASSA

ensures that the new male will pass on his genes to boost his reproductive fitness, while reducing the fitness of previous pride males.

The social nature of lions and common use of infanticide means that lion populations are greatly impacted by the loss of males. For example, when 72% of the adult males studied in Hwange National Park, Zimbabwe were harvested by hunters, these pride males were replaced by invading males that caused high rates of infanticide and disrupted population stability (Loveridge et al. 2007). Many of the harvested males were sub-adults less than 4 years old and had few opportunities to reproduce, making their loss especially impactful on the long-term stability of the population.

Because of this, trophy hunting must be managed in a way that reduces infanticide to achieve sustainable lion populations and long-term harvests. Simulation models suggest that sustainable trophy hunting can be accomplished by harvesting only adult males that have raised cubs to independence. (Note that females should never be harvested because their removal consistently leads to population decline). The age of physical and sexual maturation in male lion differs slightly between geographic areas of Africa, with males in East Africa maturing by around 4 years (Whitman et al. 2004) and males in southern Africa maturing by 6-7 years (Loveridge et al. 2007). Reproducing and raising cubs to independence typically requires an additional 1-2 years.

Studies have found that to be sustainable (achieve stable lion populations and maximum harvests), trophy hunting should harvest lions in East Africa (Tanzania) older than 6 years (Whitman et al. 2004, 2007) and lions in southern Africa older than 8 years. As a general rule, harvesting males older than 8 years maximizes both the quantity and the quality of the long-term harvest. The science of aging lions in part grew out of the need for more reliable indicators of age to make trophy hunting sustainable.

Resources

Resources for Learning to Age Lions

The ability to accurately age lions takes time and practice to develop, but is the sign of a dedicated and accomplished expert who understands lion biology. We encourage you to take advantage of the other resources that were developed alongside this training by visiting http://AgingTheAfricanLion.org, including:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

Before You Begin: Test Yourself!

To see your improvement after taking this training, we encourage you to test your lion aging score online at http://AgingTheAfricanLion/TestYourself.org. When you finish the training, test yourself again!

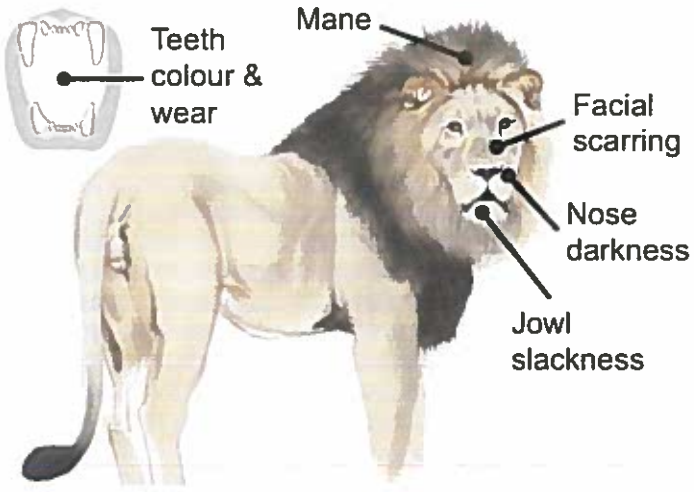
Training

How to Age a Lion

Scientific research on lions across Africa shows that a male lion's appearance changes with five main physical characteristics that can be distinguished into four age classes (Miller et al. 2016):

Aging Characteristics
- Teeth color and wear
- Facial scarring
- Nose darkness
- Mane
- Slack jowl

Age classes
1-2 years
3-4 years
5-6 years
≥7 years



Minor variation in each physical characteristic between lions of the same age means that a single trait should never be used alone to determine age: always reference 3-4 characteristics to reliably narrow down a lion's age. This will ensure the greatest accuracy possible.

Aging Characteristics

1. Teeth Color and Wear

Teeth become more yellow and worn with age.

1-2 years
White, sharp

3-4 years
Light yellow,
sharp or lightly worn

5-6 years
Light yellow,
lightly or heavily worn

≥7 years
Dark yellow, lightly
or heavily worn

2. Facial Scarring

Lions acquire scarring and pocketing on their faces due to fighting.

1-2 years
No scarring

3-4 years
No or light scarring

5-6 years
Light scarring

≥7 years
Heavy scarring

3. Nose Darkness

Lion noses darken from pink to black with age.

1-2 years
Mostly pink
0-30% black

3-4 years
Slightly black
20-60% black

5-6 years
Mostly black
40-70% black

≥7 years
Nearly all black
40-100% black

4. Mane

A male's mane develops from a Mohawk to a full, thick mane covering his forehead and shoulders.

1-2 years
No hair or very short Mohawk on head. No or very sparse mane around face, chest and neck. No shoulder mane.

3-4 years
Long Mohawk on head, bare patches between Mohawk and ears. Short mane around face, chest and neck. No shoulder mane.

5-6 years
No Mohawk. Full, long mane with forehead and shoulders filled in.

≥7 years
Full, long mane, frayed or frizzy hair.

Note: Other traits (facial scarring, teeth wear) will be more indicative of this age.

Note: Some regional differences occur in mane appearance. Lions in southern and high-lying Africa (e.g. Hwange in Zambia and Serengeti in Tanzania) show larger, thicker manes whereas lions in west-central and eastern low-lying Africa (e.g. Niassa in Mozambique and Seleous in Tanzania) show thinner, sparser manes.

5. Slack Jowl

A lion's back lip hangs in about half of individuals older than 7 years.

1-2 years
No slack jowl

3-4 years
No slack jowl

5-6 years
No slack jowl

≥7 years
Slack jowl in 50% of lions in this age group

Next Steps

Photo Galleries & Pocket Guides

After finishing this training, check out the other resources available at http://AgingTheAfricanLion.org:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

After You Finish: Re-Test Yourself

To see your improvement after reviewing this training and the online photos and pocket guides, re-test your lion aging accuracy online at http://AgingTheAfricanLion/TestYourself.org.

Pocket Guides

Pocket guides to use for quick reference in the field are available on the last pages of this course packet and online at http://AgingTheAfricanLion.org/Resources.html

Additional Reading

Links to many of these articles are freely available at http://AgingTheAfricanLion.org.

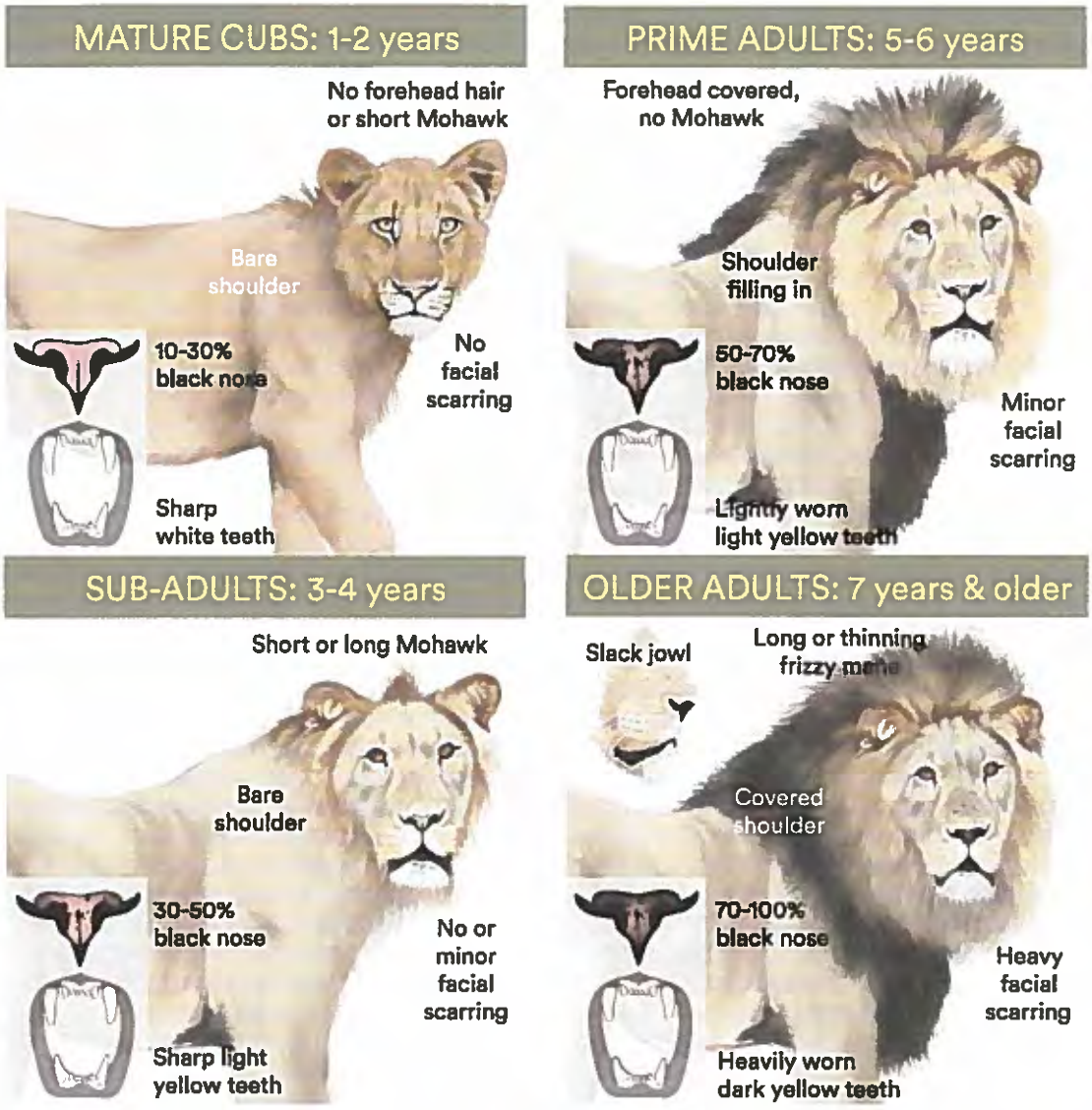
Lion Biology

- Funston, P. J., M. G. L. Mills, P. R. K. Richardson, and A. S. van Jaarsveld. 2003. Reduced dispersal and opportunistic territory acquisition in male lions (Panthera leo). Journal of Zoology 259:131–42. Free!
- Mosser, A., and C. Packer. 2009. Group territoriality and the benefits of sociality in the African lion, *Panthera leo*. Animal Behaviour 78:359–370.
- Packer, C., D. Scheel, and A. E. Pusey. 1990. Why lions form groups: food is not enough. American Naturalist 136:1–19. Free!
- Pusey, A. E., and C. Packer. 1994. Non-offspring nursing in social carnivores: minimizing the costs. Behavioral Ecology 5:362-374.

Aging Lions and Sustainable Trophy Hunting

- Creel, S., M'soka, J., Droge, E., Rosenblatt, E.G., Becker, M. S., Matandiko, W., Simpamba, T. 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy. Ecological Applications, doi: 10.1002/eap.1377.
- Loveridge, A. J., A. W. Searle, F. Murindagomo, and D. W. Macdonald. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation 134:548–558.
- Miller, J., Funston, P. J., Balme, G., Lindsey, P. A., Loveridge, A. J., Becker, M. S. Begg, C., Brink, H., Cotterill, A., Dolrenry, S., Hunt, J. E., Jansson, I., MacDonald, D. W., Mandisodza-Chikerema, R., Packer, C., Rosengren, D., Stratford, K., Trinkel, M., White, P., Winterbach, C., Winterbach, H. E. K. 2016. Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201:160-168. Free!
- Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., Watson, F., Merkle, J., Mwape, H. 2014. Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions. Biological Conservation 180:176–186. Free!
- White, P. A. , Belant, J. L. 2016. Individual variation in dental characteristics for estimating age of African lions. Wildlife Biology 22: 71–77. Free!
- White, P. A., Ikanda, D. , Ferrante, L., Chardonnet, P., Mesochina, P., Cameriere, R. 2016. Age estimation of African lions Panthera leo by ratio of tooth areas. PLoS ONE. Doi: 10.6084/m9.figshare.3159430. Free!
- Whitman, K. L., Starfield, A. M., Quadling, H. S., and C. Packer. 2004. Sustainable trophy hunting of African lions. Nature 428:175–178. Free!
- Whitman, K. L., Starfield, A. M., Quadling, H., Packer, C. 2007. Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions. Conservation Biology 21:591–601. Free!

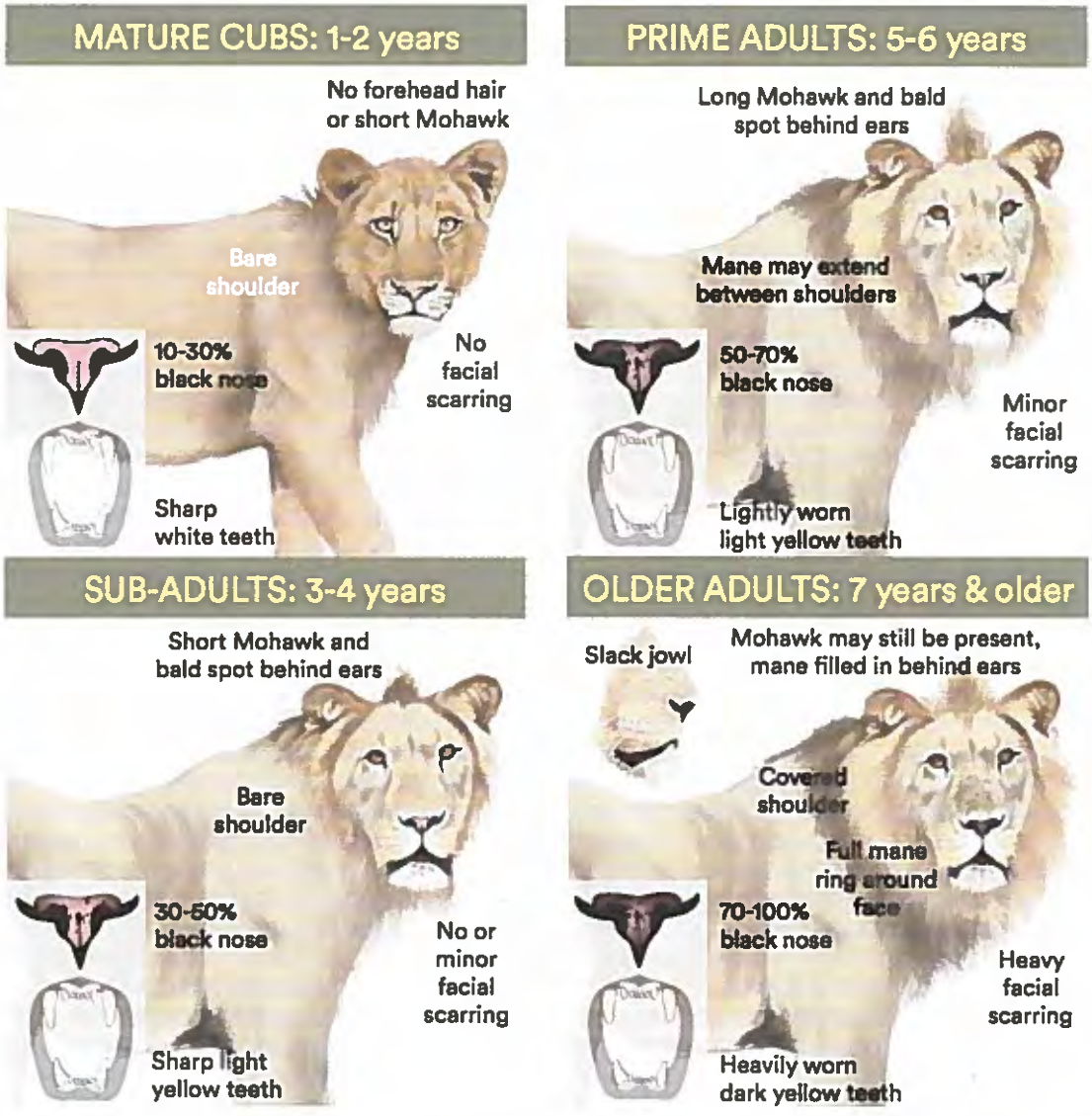
Quick Guide to Southern and High-Lying Africa
(e.g. Hwange in Zimbabwe, Serengeti in Tanzania)



Available as complete pocket guide at http://AgingTheAfricanLion/Resources.org.

Quick Guide to West-Central and Eastern Low-Lying Africa

(e.g. Niassa in Mozambique, Seleous in Tanzania)



Available as complete pocket guide at http://AgingTheAfricanLion/Resources.org.

Attached for 9c

Mokore Safaris PH Rules

See pg #12.

1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save Valley hunts please refuel at Nyika on the way in. For Sengwa Hunts please refuel at Gokwe.
2. Paperwork – Please can all PHs fill in the skinners books complete with all measurements and details. Also those hunting in Sengwa please make sure that the measurements of all trophies is completed on the ZPWMA kill returns supplied in the file.
3. Mokore Safaris is attempting to maintain the quality of our herds for the future and so the following will apply (no excuses tolerated):
   a. Any soft – top buffalo will attract a fine as follows:
      i. Over 43" spread - $1000
      ii. 40 – 43" spread - $500
      iii. 35 – 40" spread - $ 200
      iv. Below 35" – fire at will!

b. Any lion under the age of 5 years - $ 10 000
c. Any sable without at least 2" secondary thickening - $200
d. Any elephant under 40 lbs in the Save - $500

Barry, Anna <anna_barry@fws.gov>

Re: [EXTERNAL] African Lion permit application MA83127C-0

2 messages

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Nov 29, 2018 at 12:09 PM
(b) (6)
Cc: "Permits, FWHQ" <permits@fws.gov>
Bcc: anna_barry@fws.gov

Good afternoon Mr. Limmer,

Thank you for your email. Your application, PRT-93127C, is currently pending. As you mention, our office is evaluating each application on a application-by-application basis. As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We will review each application received for import of sport-hunted trophies and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Thu, Nov 29, 2018 at 12:10 AM Scott Limmer (b) (6) wrote:

> Dear Sirs:
>
> I applied for a lion import permit in March and sent detailed information on population data and conservation information for the population and area to be hunted due to the new “case-by-case” evaluation criteria mandated by the new rules. It has been eight months and all I have received is a confirmation that USFWS received my application. The PRT identification number is MA83127C-0.
>
> Has a decision on my application been made? If not, can you give me any indication as to when I may hear about a decision? With the election over, I thought I might know by now. Any information would be appreciated. Please fell free to contact me via phone, email or letter.
>
> Respectfully submitted,
>
> Scott Alan Limmer
> 1483 Ranch Springs Road
> Laporte, CO 80535
> 970.223.5330h
> 970.222.2109c
>
> Sent from my iPhone

Management Authority, FWHQ <managementauthority@fws.gov> Fri, Nov 30, 2018 at 1:54 PM
To: Anna Barry <anna_barry@fws.gov>

Just FYI.
****

Please review the U.S. Fish and Wildlife Service's Office of Law Enforcement's webpage on importing and exporting commercial wildlife shipments. Contact the Office of Law Enforcement to see if your situation applies.

Wildlife (including parts and products) imported or exported from the U.S. must be declared to the U.S. Fish and Wildlife Service. Please contact the Wildlife Inspector at the appropriate designated port to learn the requirements for your shipment.

Contact USDA-APHIS to determine their quarantine and health certificate requirements for import and export. Visit their website or call the National Import Export Services (NIES) Call Center: 301-851-3300.

Please check with the CDC for their requirements.

Contact the State and foreign country to check on their requirements.

We encourage permit applicants to review our tips and reminders for completing applications.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

---------- Forwarded message ---------
From: **Scott Limmer** (b) (6)
Date: Thu, Nov 29, 2018 at 6:32 PM
Subject: Re: [EXTERNAL] African Lion permit application MA83127C-0
To: Management Authority, FWHQ <managementauthority@fws.gov>
Cc: Permits, FWHQ <permits@fws.gov>

Dear USFWS,

Thanks for getting back to me so quickly. I know you all are very busy.

Your response doesn't really tell me anything new and I understand the process to a degree. The area I would be hunting, the Save Valley Conservancy, is known to have a very healthy lion population. In addition, the Duckworth family of Mokore Safaris, are among the finest of safari operators in all of Africa. I have hunted with them before for plains game and their anti-poaching efforts and other conservation efforts are quite commendable. The amount of snares and gin traps that they have seized and destroyed are amazing in both the SVC in Zimbabwe and in Coutada 9 in Mozambique. Poaching in their areas has slowed to a trickle but they need USA hunters to keep their efforts afloat.

If you know of a better place to apply and be approved, that info would be greatly appreciated.

Thanks,

Scott Alan Limmer
(b) (6)
Laporte, CO 80535
(b) (6)

Sent from my iPhone
[Quoted text hidden]

From: King, Jenna D
To: (b) (6)
Subject: FWS Permit Application #83127C
Date: Friday, August 14, 2020 1:16:14 PM

Hello Mr. Limmer,

This email is in regard to your FWS permit application #83127C to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 4/6/19-4/26/19 or 7/1/20-7/21/20. Please provide the specific date that the lion was taken. Please also confirm which ranch in the Save Valley Conservancy the lion was taken from. Thank you.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: King, Jenna D
To: Cogliano, Mary
Subject: Fw: [EXTERNAL] Re: FWS Permit Application #83127C
Date: Thursday, August 27, 2020 9:56:33 AM
Attachments: Habitat Enhancement Report- Mokore Safaris Zimbabwe.docx

---

Hi Mary,

I'm wondering the best way to respond to Mr. Limmer. Since we need the exact DOH and ranch where lion is taken from, it doesn't seem to me that we can issue a permit before the hunt, right? Thank you for your help!!

Jenna

From: Brisendine, Amy <amy_brisendine@fws.gov>
Sent: Thursday, August 27, 2020 9:38 AM
To: King, Jenna D <jenna_king@fws.gov>
Subject: Fw: [EXTERNAL] Re: FWS Permit Application #83127C

Hi Jenna,

Please send your question to Mary.

-Amy

From: King, Jenna D <jenna_king@fws.gov>
Sent: Thursday, August 27, 2020 9:29 AM
To: Brisendine, Amy <amy_brisendine@fws.gov>
Subject: Fw: [EXTERNAL] Re: FWS Permit Application #83127C

Hi Amy,

I'm wondering the best way to respond to Mr. Limmer. Since we need the exact DOH and ranch where lion is taken from, it doesn't seem to me that we can issue a permit before the hunt, right? Thanks for your help!!

Jenna

From: Scott Limmer (b) (6)
Sent: Thursday, August 27, 2020 3:28 AM
To: King, Jenna D <jenna_king@fws.gov>
Subject: [EXTERNAL] Re: FWS Permit Application #83127C

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Ms. King,

My intention is to wait to hunt until I am issued an import permit from the FWS. I applied for the permit well in advance of the hunt, as recommended by the FWS. When I did not receive the permit, I postponed my hunt while waiting to hear back from the FWS about my application.

I have a deposit on file with Mokore Safaris (owned by the Duckworth Family) so that I can go on the hunt as soon as I receive a permit. I have hunted with the Duckworths before for other species and they are among the best hunter-conservationists in Africa. The Duckworths own and I will hunt on the Mokore Ranch in the middle of the SVC. The Mokore Ranch borders the large Sango Ranch, where I can also make arrangements to hunt a lion. If you have a preference between these two ranches that would increase my chances of obtaining a permit, let me know and I will make the necessary arrangements.

I would appreciate being issued a permit before I go there to hunt a lion. Please let me know if this is possible? Due to the healthy number of lions on the Mokore Ranch, I am told that the chance of success would be near 100%.

Please let me know if there is any other info that you need. I was happy to get your email message.

Respectfully submitted,

Scott Limmer
(b) (6)
Laporte, CO 80535
(b) (6)

On Friday, August 14, 2020, 11:16:36 AM MDT, King, Jenna D <jenna_king@fws.gov> wrote:

Hello Mr. Limmer,

This email is in regard to your FWS permit application #83127C to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 4/6/19-4/26/19 or 7/1/20-7/21/20. Please provide the specific date that the lion was taken. Please also confirm which ranch in the Save Valley Conservancy the lion was taken from.

Thank you.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Fw: [EXTERNAL] Re: FWS Permit Application #83127C

King, Jenna D <jenna_king@fws.gov>
Wed 9/23/2020 11:01 AM
To: Brisendine, Amy <amy_brisendine@fws.gov>

From: Sco Limmer (b) (6)
Sent: Monday, September 14, 2020 2:31 AM
To: King, Jenna D <jenna_king@fws.gov>
Subject: Re: [EXTERNAL] Re: FWS Permit Applicaon #83127C

Dear Ms. King,

What did you find out? I understand that in the past, it was okay to apply for a permit before hunting. I hope the USFWS isn't only issuing permits after a hunt now. That would be a change from before.

I have been very patient and have been waiting to hear back since I filed my application a long time ago. The area I plan to hunt is well managed and I believe it would qualify for a permit in the case by case evaluation.

Please let me know what is going on and if my permit is still being considered.

Thanks,

Scott Limmer
(b) (6)
Laporte, CO 80535
(b) (6)

Sent from my iPhone

> On Aug 27, 2020, at 3:14 PM, King, Jenna D <jenna_king@fws.gov> wrote:
>
> Hello Mr. Limmer,
>
> Thank you, I have received the informaon and ha ve added it to your applicaon. I do not have informaon y et on whether we can issue a permit before the hunt. I will nof y you when I know the answer.
>
> Thank you,
>
> Jenna King
> U.S. Fish and Wildlife Service
> Internaonal Aff airs, Division of Management Authority

Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
hp s://www.fws.gov/internaonal/permits/
hp s://www.cites.org

From: Sco Limmer (b) (6)
Sent: Thursday, August 27, 2020 3:51 PM
To: King, Jenna D <jenna_king@fws.gov>
Subject: [EXTERNAL] Re: FWS Permit Applicaon #83127C

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Ms. King,

After responding to you earlier, I received an email from Gary Duckworth of Mokore Safaris stating that in addition to the Mokore Ranch, they also have the Umkondo Ranch directly bordering Mokore Ranch.

Thanks,

Scott Limmer
(b) (6)
Laporte, CO 80535
(b) (6)

On Friday, August 14, 2020, 11:16:36 AM MDT, King, Jenna D <jenna_king@fws.gov> wrote:

Hello Mr. Limmer,

This email is in regard to your FWS permit applicaon #83127C t o import a lion trophy from Zimbabwe. On the applicaon, it w as indicated that the hunt was to take place between 4/6/19-4/26/19 or 7/1/20-7/21/20. Please provide the specific date that the lion was taken. Please also confirm which ranch in the Save Valley Conservancy the lion was taken from. Thank you.

Please reply directly to this email with the requested informaon.

Thank you and let me know if you have any quesons.

In accordance with 50 CFR 13.ll(e), if the requested informaon is not rec eived by this office ***within 45 calendar days of the date of this email****, your applicaon will be abandoned and administravely closed. Onc e a file is closed, you will need to submit a new applicaon, and all required fees, for the Service to consider your proposed acvity .*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
Internaonal Aff airs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
hp s://www.fws.gov/internaonal/permits/
hp s://www.cites.org

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A Force For Wildlife Conservation

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U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find four applications to import sport-hunted trophies.

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km^2 property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over $61,000/year in anti-poaching, $45,000/year in community projects, and $30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

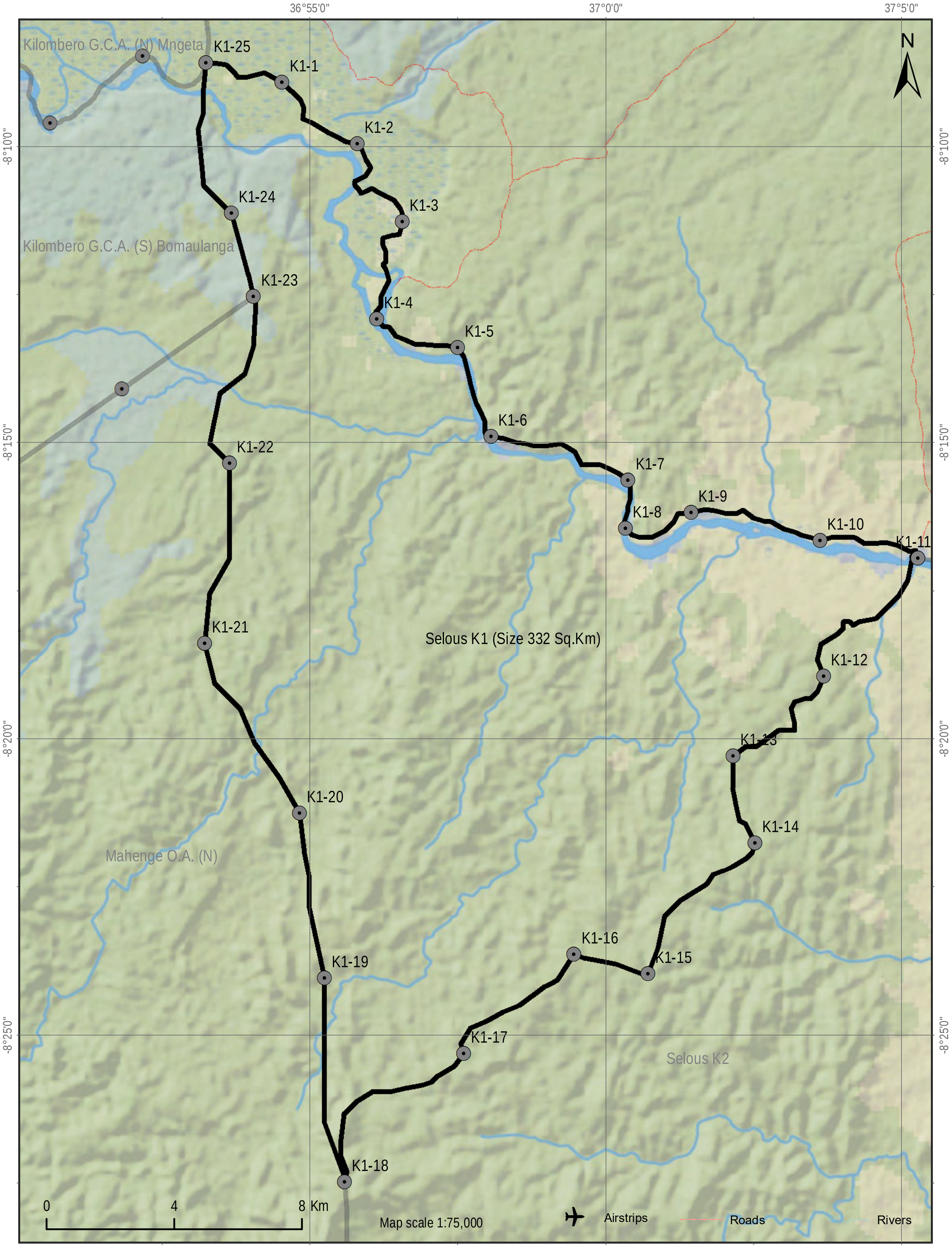
Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

SELOUS K 1 G.R HUNTING BLOCK GPS COORDINATES: 2013-2018



GPS ID	K1-1	K1-2	K1-3	K1-4	K1-5	K1-6	K1-7	K1-8	K1-9	K1-10	K1-11	K1-12	K1-13	K1-14	K1-15	K1-16	K1-17	K1-18	K1-19	K1-20	K1-21	K1-22	K1-23	K1-24	K1-25
Latitude	-8.149	-8.166	-8.188	-8.215	-8.223	-8.248	-8.261	-8.274	-8.27	-8.278	-8.282	-8.316	-8.338	-8.363	-8.4	-8.394	-8.422	-8.458	-8.401	-8.354	-8.306	-8.256	-8.209	-8.185	-8.143
Longitude	36.909	36.93	36.943	36.936	36.958	36.968	37.006	37.006	37.024	37.06	37.088	37.061	37.036	37.042	37.012	36.991	36.96	36.927	36.921	36.914	36.887	36.894	36.901	36.895	36.888

Coordinate System: GCS, Datum: Arc 1960, Units: Degrees

Data source: TAWIRI, 2010

Map production: TAWIRI, 2012

1. Name of area operator: Rungwa Game safaris T Ltd

   a. Years in business: 18 Years

   b. Name of company conducting hunt: Adam Clements Safaris & Melami Hunting safaris co Ltd

   2. Name of concession: _Selous G.R K1 Size in km^2: _332 Sq. Km

   a. Land tenure: _X_ Government lease __ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 5 years Can it be renewed? _X_ Yes __ No

   c. Length of renewal, if applicable: ____5Years

   d. Estimated total amount received in trophy fees last year, if applicable: $ 137,000/-

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

   Yes, We do Antipoaching control , Community investment & Employment

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Morogoro ,Tanzania

   g. If the concession borders a national park, please provide the park name: NO

   h. Description of general and distinctive habitat features and any water features:
   _____
   ____

3. Are there any communities living in the concession? __ Yes _X_ No

   a. If so, estimated number of people or villages in the concession?
   _____

4. Are there communities bordering this concession? __ Yes _X_ No

   a. If so, estimated number of people or villages around the concession?
   _____

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Avg	20	Stable	
Lion	Avg	30	Stable	
Leopard	Avg	40	Stable	

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Prey species				

6. Total employment number: _____52

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	5	
Trackers	10	6
Anti-poaching scouts/rangers	5	
Other anti-poaching	13	3
Cooks/housekeepers	10	4
Community coordinators		
Managers	4	
Biologists		
Others: _____	10	

7. Number of staff employed in the off-season: _____25

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	10		
Managers	2		
Maintenance	2		
Road opening/ construction	8		
Community relations personnel			
Others: _____	3		

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 10

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? : Both

   c. Months during which anti-poaching patrols are conducted: ____April- Dec

   d. Number of anti-poaching patrols per month: ___4 patrols

   e. Description of anti-poaching equipment, vehicles, etc.: land cruiser, radio call, boat, camera etc

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Game scout

   g. Do you offer rewards to poaching informants leading to arrest? _x Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? _X_ Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ____US Dollars_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	$3,000	$3,500	$3,500	
Equipment	$1,300	$2,000	$2,000	
Vehicles	$2,650	$2,950	$3,300	
Petrol	$3,000	$3,400	$3,800	
Rewards paid	$1,500	$2,000	$2,000	
Other: _____				
Other: _____				
TOTALS	$11,450	$13,850	$14,600	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	8	11	6	
Elephant carcasses observed				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected	10	12	8	
Firearms confiscated	3	2	2	
Vehicles confiscated				
Bicycles confiscated	5	8	5	
Boats/nets confiscated		2	2	
Tusks recovered				
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _x_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? Required by law & Voluntary

c. Does the company provide game meat to nearby communities? __ Yes _X_ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: _____NA_____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
_____NA_____

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	$5,000	$5,000	$5,000	Class room
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities	$10,000	$5,000	$5,000	
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS	$15,000	$10,000	$10,000	

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 18 2016:10 2017:10
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015:90 % 2016: 95% 2017: 95%
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: $220,000 2016: $160,000 2017: $137,000

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _____95%_____

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

    Signature: *Adam Clements*

    Name: Adam Clements Title: Professional Hunter & Operator

Barry, Anna <anna_barry@fws.gov>

Woodland Park Zoological Society PRT #80905C

Krista Adelhardt <Krista.Adelhardt@zoo.org> Thu, Jul 26, 2018 at 5:48 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Hi, Anna – Just checking in on this permit app. Any updates on it? One of the meerkats we were going to transfer unfortunately died earlier this week, so her cage mate is without a friend un l we can get her to Memphis.

Krista Adelhardt | WOODLAND PARK ZOO
Animal Management Registrar

Off Friday – Saturday

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Thursday, July 19, 2018 1:49 PM
To: Krista Adelhardt <Krista.Adelhardt@Zoo.org>
Subject: Woodland Park Zoological Society PRT #80905C

Thanks Krista, I will work with my supervisor to have this finalize and e-mail early next week.

Thanks for your patience.

Anna Barry

Senior Biologist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

***Sign up** for our e-newsletter to learn how we're working around the globe to protect species and their habitats!*

[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

David Turner PRT #84925C

1 message

Barry, Anna <anna_barry@fws.gov> Fri, Jul 27, 2018 at 5:09 PM
To: "John J. Jackson, III" <jjj@conservationforce.org>
Cc: "Vargas, Darcy" <darcy_vargas@fws.gov>

Received, the additional information has been placed in the file.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Jul 27, 2018 at 11:33 AM, John J. Jackson, III <jjj@conservationforce.org> wrote:

> -------- Forwarded Message --------
> **Subject:**Fwd: Fwd: Lion permit
> **Date:**Fri, 27 Jul 2018 10:27:08 -0500
> **From:**John J. Jackson, III <jjj@conservationforce.org>
> **To:**Julia_butzler@fws.gov
> **CC:**Adam Clements <adam@safaritrackers.com>, dave.turner122@yahoo.com, leslie.gallardo@conservationforce.org
>
> Julia,
>
> Please see attached 2018 Operator Enhancement Questionnaire for David Turner (PRT 84925C). Please contact us if you need anymore information.
>
> Thanks,
>
> John

-------- Forwarded Message --------
Subject: Fwd: Lion permit
Date: Fri, 27 Jul 2018 06:58:49 -0600
From: Dave Turner (b) (6)
To: John J. Jackson III <jjj@conservationforce.org>

Here is the forms filled out

Dave Turner
208 941-9737

Begin forwarded message:

> **From:** Adam Clements <adam@safaritrackers.com>
> **Date:** July 27, 2018 at 4:24:48 AM MDT
> **To:** (b) (6)
> **Cc:** Safari Trackers <safari@safaritrackers.com>
> **Subject: Lion permit**
>
> Dave,
>
> See attached the questionnaire that I filled out the best possible from the bush. Let me know if you have any questions Dave.

Barry, Anna <anna_barry@fws.gov>

David D. Turner PRT #84925C

1 message

Barry, Anna <anna_barry@fws.gov> Fri, Aug 24, 2018 at 12:50 PM
To: safari@safaritrackers.com
Cc: "John J. Jackson, III" <jjj@conservationforce.org>, (b) (6)
Bcc: Julia Butzler <julia_butzler@fws.gov>, Kathleen Moore <kathleen_moore@fws.gov>

Dear Alicanne Benedum,

We would need a Power of Attorney statement in order to discuss Mr. Turner's file with you. Once we have that information we can provide you with information.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. **We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Aug 24, 2018 at 12:41 PM, <safari@safaritrackers.com> wrote:

> Dear Anna,
>
> I hope all is well. I was wondering if I could get a status update for my client regarding his CITES permit. Mr. David Wayne Turner CITES #84925C. Would you please let me know if and when he may receive his permit. Thank you and have a great weekend.
>
> Sincerely,
>
> Alicanne Benedum

Adam Clements Safari Trackers

210.698.0077

safari@safaritrackers.com

Barry, Anna <anna_barry@fws.gov>

David D. Turner PRT #84925C

2 messages

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To: safari@safaritrackers.com
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Bcc: Julia Butzler <julia_butzler@fws.gov>, Kathleen Moore <kathleen_moore@fws.gov>

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>
> Sincerely,
>
> Alicanne Benedum

Adam Clements Safari Trackers

210.698.0077

safari@safaritrackers.com

Safari Trackers <safari@safaritrackers.com> Fri, Aug 24, 2018 at 12:58 PM
To: "Barry, Anna" <anna_barry@fws.gov>
Cc: "John J. Jackson, III" <jjj@conservationforce.org>, (b) (6)

Anna,
Thank you very much. I am contacting the client now.

Very Truly,
Alicanne Bracken Benedum

Adam Clements Safari Trackers
(210)698-0077
Sent from my iPhone
[Quoted text hidden]

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import applications / request for information

2 messages

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:08 PM
To: jjj@conservationforce.org, cf@conservationforce.org
Cc: Mary Cogliano <mary_cogliano@fws.gov>

Mr. Jackson,

We are in the process of reviewing applications for the import of African lions taken from Tanzania. A number of applicants have named you as the representative for all matters concerning the application. I have attached a list of the applications currently pending for which you have been named as the representative.

As you are aware, the U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. As you know, we are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings. As such, we would like to give you the opportunity to submit additional information in support of these application requests. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

TZlionApplications-RepJJackson.xlsx
16K

Butzler, Julia <julia_butzler@fws.gov> Wed, Jul 25, 2018 at 10:22 AM
To: jjj@conservationforce.org, cf@conservationforce.org, (b) (6)

Mr. Jackson,

Please use the updated spreadsheet for reference of the applications that name you as their representative.

Thank you,
[Quoted text hidden]

TZlionApplications-RepJJackson.xlsx
17K

Butzler, Julia <julia_butzler@fws.gov>

Import application / TZ lion / Withdrawn

1 message

Butzler, Julia <julia_butzler@fws.gov> Mon, Aug 26, 2019 at 3:52 PM
To (b)(6)

Mr. Turner,

Thank you for returning my call. As discussed, I have withdrawn your application to import a lion taken in 2018 from Tanzania.

Sincerely,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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March 22, 2018

RCVD MAR 27 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find four applications to import sport-hunted trophies.

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km^2 property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over $61,000/year in anti-poaching, $45,000/year in community projects, and $30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

RCVD MAR 27 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: Dwight Steven Dowbrul

Date: 3/10/18

RCVD MAR 27 2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Van Brunt	Dwight	Steven	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block, U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Kalispell	MT	59901	Flathead	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is ge and belief. I understand that any false statement herein may subject me to the criminal penalties

(b)(6)

03/19/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John Jackson, Conservation Force, (504) 837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo melanochaita - lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Namibia, Kalahari Game Lodge, Karas Region, 25 29'5.22 S, 19 52'37.08 E

   b. Date wildlife is to be hunted: April 28 - May 13, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Jamy Traut Hunting Safaris, Jamy Traut

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). N/A - Not yet hunted.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	
Address:	Jamy Traut Hunting SAFARIS
City:	Farm Gravenstein 65
State/Province:	Windhoek, Namibia 9000
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

According to the landowner, Kalahari Game Lodge, the lion population on their property is wonderfully stable and increasing. In fact, population has increased to the point that at least two large males we killed in territorial disputes in 2017.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

All trophy fees from this hunt will be used by the landowner to enhance the lion population on the property. Primary applications will be habitat improvement (permitting lion prides to spread to portions of the property currently unused, thereby reducing conflicts) and the continuance of ongoing study. I have paid $20,000 to the professional hunter long ago and will be paying another $30,000+ to the landowner prior to the hunt.

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

The landowner is a wonderful steward of the tremendous wildlife species and population which inhabit their 250K acres. The lion population has been carefully monitored and studied for years. The situation is somewhat pressing, as both population growth and conflict have resulted in the death of at least two mature males in recent months. No lion hunting has taken place for over three years, but the landowner now believes the best course of action is to permit the hunting of one old male to relieve some of the stress on the population, with the hunting fee earmarked for habitat improvement and continued study. The landowner feels that if an old male is not taken soon, that additional conflict will occur and the opportunity lost forever.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand [redacted] States, cannot be re-exported.

    Applicant's signature: (b)(6) Date: 03/19/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

kalahari
GAME LODGE
NAMIBIA

15 March 2018

To Whom It May Concern,

Enhancement of free roaming Kalahari Lions

The Kalahari Game Lodge (herein KGL) is a private game lodge of 40,000 contiguous hectares bordering the Kgalagadi Transfrontier Park on Namibia's south-eastern border. More specifically, it is approximately 18 kilometers west of the Mata-Mata border post.

While primary commercial activities include game viewing, 4x4 drives, hiking, birding and other tourism activities, KGL has a well-established history of being professionally hunted for plains game and lion. Hunting is not only a meaningful source of revenue, but entirely necessary in order to keep populations balanced and in check. Jamy Traut of Jamy Traut Hunting Safaris has exclusively conducted these hunts since 2011.

At this time, KGL has determined it necessary to take out four lions in order to balance with available food (prey) and habitat (territory size). At least two adult/mature male lions were killed in territorial disputes in 2017, and we believe it now necessary to remove two additional adult males and two adult females as quickly as possible in order to avoid further conflict and loss. These internal population conflicts and potential risks of migration of surplus lions to neighbouring areas where livestock is a major source of income, has been recognized by the Namibian Ministry of Environment and Tourism, and they have granted KGL with permits to hunt two lions during 2018.

Current population – KGL closely monitors lion population numbers. The population is growing dynamically due to natural recruitment (birth) and migration.

KGL currently supports a population of approximately 22 wild lions, distributed as follows:

1 x males age 10+ years
1 x males age 6-9 years
4 x males age 3-5 years

4 x females age 6-9 years
4 x females age 3-5 year

8 x additional lions age under 3 years males & Females

Vat Number: 0040130015 | Reg Number: 85/02652

Kalahari Gemsbok Ranch (Pty) ltd.

Tel: +264 63 252 052 | Email: info@kalaharigamelodge.com.na | Web: www.kalaharigamelodge.com.na
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.E. Dreyer

kalahari
GAME LODGE
NAMIBIA

Migration – KGL border is fenced and has been for many years. Even with constant monitoring, maintenance and improvement, lions are still entering the property. This recruitment causes immediate conflict with and imposes stress upon existing prides. Given the nature of lions, mortality of both cubs and mature males has become a pressing concern.

Summary – Authorized by the Namibian Government, KGL will be able to selectively remove two adult lions this year. Doing so will provide a significant amount of revenue that will be turned back to the property for game management, relieve stress on the existing lion and plains game populations and contribute also contribute to local employment.

Kind Regards,

DE Dreyer

Vat Number: 0040130015 | Reg Number: 85/02652

Kalahari Gemsbok Ranch (Pty) ltd.

Tel: +264 63 252 052 | Email: info@kalaharigamelodge.com.na | Web: www.kalaharigamelodge.com.na
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.E. Dreyer

kalahari
GAME LODGE
NAMIBIA

kalahari
GAME LODGE
NAMIBIA

+ ECOLOGY

+ SPECIES

- REHABILITATION AND CONSERVATION

The Kalahari Game Lodge and it's surrounding 40 000 ha was previously used for farming sheep and cattle. As a result, the livestock fences had to be removed before wildlife could be re-established.

Accordingly, the lodge initiated a number of restoration projects to restore the natural grassland to its unadulterated state and reintroduce the wildlife that naturally occurred in this area. The aim is to restore the Kalahari eco-system that was largely destroyed by farming, which disbursed much of the natural wildlife in Namibia's Kalahari Desert.

Currently, Kalahari Game Lodge is home to the only population of free-roaming Kalahari lion in Namibia. Our aim is to create a conservation area in which these magnificent animals are protected amid surrounding farmlands.

A unique feature of the male lions is their often very dark to almost pitch black manes. This is due to the specific genetic make-up of the Kalahari lion population; accordingly, we are careful not to introduce other genealogies to the region. To see the magnificent beasts in their natural habitat is indeed a wonderful and memorable experience!

In addition to the black-mane Kalahari lion, the lodge is also home to a number of endangered species that roam the dunes. Among them are the brown hyena, pangolin, African hedgehog, and the striped polecat.

About

Reaching the Kalahari Game Lodge
Namibia

Accommodation

The Lodge
Campsites
Rates
Facilities

Activities

Lion Tracking
Game Viewing
4x4 Drives
Dune Braai
Hiking
Birding

Wildlife and sustainability

Ecology
Species
Rehabilitation and conservation

Gallery

Lodge and Campsites
Wildlife
Activities

Brisendine, Amy <amy_brisendine@fws.gov>

Fwd: [EXTERNAL] Namibia Lion permit - Dwight Van Brunt

1 message

Cogliano, Mary <mary_cogliano@fws.gov> Tue, Mar 5, 2019 at 10:39 AM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>

Hi Amy,

I'm forwarding you Dwight Van Brunt's Fed-Ex account number to you so we can send his package by Federal Express once we finalize everyhing. See below...

Thank you,

Mary

---------- Forwarded message ---------
From: (b) (6)
Date: Tue, Mar 5, 2019 at 10:17 AM
Subject: Re: [EXTERNAL] Namibia Lion permit - Dwight Van Brunt
To: Cogliano, Mary <mary_cogliano@fws.gov>

Mary,

Thank you once again!

Is it possible to just use my FedEx account number (290639018)?

If not, I will of course figure out how to do a label. Never done one before...

Dwight

From: Cogliano, Mary <mary_cogliano@fws.gov>
Sent: Tuesday, March 5, 2019 8:13 AM
To: Kodiak 454
Subject: Re: [EXTERNAL] Namibia Lion permit - Dwight Van Brunt

Hi Mr. Van Brunt,

I'm glad to see this is good news to you. If you could email me a pre-paid Federal Express label, then we can easily attach it to a Fed-X envelope and get it out to you as soon as I sign off on it.

Best regards,

Mary

On Sun, Mar 3, 2019 at 11:38 AM (b) (6) wrote:

> Mary!
>
> Thank you so very much for this wonderful news!
>
> Is there anything I can do to expedite its delivery (pay for overnight delivery, etc.)?

This is simply the best news I could receive. I'm over the moon!

Most sincerely!

Dwight Van Brunt

From: Cogliano, Mary <mary_cogliano@fws.gov>
Sent: Sunday, March 3, 2019 7:35 AM
To: Kodiak 454
Subject: Re: [EXTERNAL] Namibia Lion permit - Dwight Van Brunt

Good morning, Mr. Van Brunt,

Thank you for your understanding. I expect to have your permit finalized by the end of this week. We've been working through these applications, and yours is being processed as we speak and near completion. Please accept my apologies for the delay.

Best regards,

Mary

On Fri, Mar 1, 2019 at 8:57 PM (b) (6) wrote:

> Dear Ms. Cogliano,
>
> I sincerely hope this message finds you well and "seled back in" a . er the government shutdown. I cannot imagine how significantly this episode impacted your work, but realize it surely didn't help.
>
> As it has been exactly eleven months since my applicaon w as received by USFW, and since I have become the very definion of ner vousness and worry over the skin beginning to deteriorate, I wanted to reach out for two reasons.
>
> First, I would like to check the status and (hopefully) get some idea where things stand. Second, if anything at all is needed from the Namibian government, I want you to know that I am prepared to fly over on short noce and w alk it through. I will do whatever it takes, as it is necessary to act quickly now in order to avoid damage to the skin.
>
> I'm turning 60 in a few days and know this opportunity will never come my way again - so please forgive my anxiousness.
>
> I look forward to hearing from you and stand ready to assist in any way that might prove meaningful.
>
> Respecully ,
>
> Dwight Van Brunt
> (b) (6)

From: Cogliano, Mary <mary_cogliano@fws.gov>
Sent: Monday, September 24, 2018 1:16 PM
To: (b) (6)

Cc: Pamela Scruggs; Carlson Bremer, Daphne
Subject: Namibia Lion permit

Dear Mr. Van Brunt,

I want to apologize for my delay in getting back to you since our first conversation about your permit application to import a lion, which you hunted in Namibia. When I returned from vacation, I had a large amount of work to accomplish while I was away on vacation, and I was unable to call you before I left a week later for a two and a half week work trip to Angola. While in Angola, I picked up a virus, and was in bed for a week after returning. Today is my first day back in the office in three and a half weeks.

I want to let you know that I received your voicemails, and I understand your concerns, however, please know that we have been processing and issuing lion import permits that meet the regulatory requirements, and there are no indications that will change. Unfortunately, with the new process in place for making enhancement findings on a case-by-case basis, we have a huge backlog of applications to work through. It takes a significant amount of time to draft and finalize each enhancement finding in accordance with our legal obligations, and we're moving as quickly as we can with our current staff resources. I have taken a look at your application, and upon my preliminary look, I didn't notice any large holes in the application you provided. With that said, once the biologist reviews it, she might have some additional questions for you. I cannot guarantee when your application review will be completed, but I can assure you that we are working through each permit application as quickly and diligently as we can.

Thank you,

Mary

--
Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803
Phone: (703) 358-1991

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Falls Church, VA 22041-3803
Phone: (703) 358-1991

Cogliano, Mary <mary_cogliano@fws.gov>

[EXTERNAL] Fwd: RE: Dwight Van Brunt - Lion

1 message

John J. Jackson, III <jjj@conservationforce.org> Mon, Nov 19, 2018 at 3:32 PM
To: Mary_Cogliano@fws.gov

-------- Forwarded Message --------
Subject:RE: Dwight Van Brunt - Lion
Date: Sat, 17 Nov 2018 17:56:02 +0200
From:management@kalaharigamelodge.com.na
To:'John J. Jackson, III' <jjj@conservationforce.org>

John,

Thank you for contacting us for these clarifications.

The 99,000-acre property has a "border fence", but this structure does not preclude the movement of lion on or off the property. The fence has significant variations in height, design and components, and along the Kalahari Gemsbok Park, is not always maintained well, frequently downed by the larger antelope species and burrowed under by warthog and hyena (these holes then expanded by lion as they come and go). Therefore the lions can move between the Game reserve and the National Park, and do so occasionally.

The strong population of natural prey species serves to attract and hold their expanding population here at the Game Reserve. Recruitment from birth as well as migration is consistent to the point of reaching critical mass, which is why the Namibian Government designated two male lions as a problem due to conflicts and population density. Another reason the prides prefer to remain on the Game Reserve property is that they enter into immediate conflict with surrounding landowners should they cross a border.

The (at least) two adult male lions killed in territorial disputes speaks to the density of the current population and its related stresses. As mentioned before, this property has the strongest prey population in the area while the surrounding properties operate as farms/ranches. Lions entering those properties also enter into immediate conflict with landowners as they then prey on sheep and cattle, and are always killed on sight, no matter their age or sex.

By allowing very limited and selective lion hunting on the property, the associated revenue can then be directed to enhancing habitat in a manner that will immediately support more prides. The subject hunt played a critical role in ensuring the viability of our lion habitat for years to come.

I will be standing by should additional clarification be desired.

Kind Regards,

Riaan Beeslaar

Management

NB: Please note no travel is allowed through the Kgalagadi Transfrontier park crossing into another country without a required 2 night stay inside the park

I will be standing by should additional clarification be desired.

Respectfully,

From: John J. Jackson, III <jjj@conservationforce.org>
Sent: Wednesday, 14 November 2018 5:12 PM
To: info@kalaharigamelodge.com.na
Cc: JJJ Travel (b) (6)
Subject: Dwight Van Brunt - Lion

Priority: Is your Lodge high fenced? How do you have a definitive lion population if the area is not high fenced? Please rush your answer today.

Second, what was your point in pointing out the two males had been killed? Where the lion not free, fenced, so they could avoid the conflict?

Thanks,

John

--

Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145
jjj@conservationforce.org • www.conservationforce.org

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2541

PERMIT No.:	157491 E
VALID TILL:	18-06-2019
CAPTURE / TROPHY OR OTHER RELEVANT PERMIT	178261 |18
RECEIPT No.:	5769995

PERMIT TO EXPORT LIVE ANIMALS OR TROPHIES

IMPORT PERMIT:
(Live animals)

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

From: Jamy Traut
Postal address: PO Box 35576
Windhoek
Namibia.

To: Dwight Steven Van Brunt
Residential address: (b)(6)
59981 Kalispell MT.
United States.

SPECIES: COMMON NAME		SCIENTIFIC NAME	LIVE	SKULL	HORNS	SKIN	SHOULDER MOUNT	OTHER
Baboon	CITES II	*Papio ursinus*						
Blesbok		*Damaliscus pygargus phillipsi*						
Cheetah	CITES I	*Acinonyx jubatus*						
Eland		*Taurotragus oryx*						
Grey Duiker		*Sylvicapra grimmia*						
Impala, common		*Aepyceros melampus*						
Kudu		*Tragelaphus strepsiceros*						
Leopard	CITES I	*Panthera pardus*						
Oryx (Gemsbok)		*Oryx gazella*						
Ostrich		*Struthio camelus*						
Red hartebeest		*Alcelaphus buselaphus*						
Springbok		*Antidorcas marsupialis*						
Steenbok		*Raphicerus campestris*						
Warthog		*Phacochoerus africanus*						
Wildebeest, black		*Connochaetes gnou*						
Wildebeest, blue		*Connochaetes taurinus*						
Zebra, Burchell's		*Equus burchelli*						
Zebra, Hartmann's	CITES II	*Equus zebra hartmannae*						
Other Lion		Panthera leo	—	1x-	1x jaw	1x-	2x Collarbones	

IMPORTANT
All exports remain subject to veterinary and import regulations.
This permit is valid for single consignment only.
This permit is not valid if altered in any way and is not transferable.

NAPL 02/2018

CITES

CITES Export Permit No.: 0058341

CITES Import Permit number from importing country (Appendix 1 only) .....

Official Customs stamp at point of export

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No. 0058341

[X] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER:

Original

2. Valid until: 18/06/2019

3. Importer (name and address)
Dwight Steven van Brunt
(b)(6)
59901 Kalispell
MT

3a. Country of import: U S A

4. Exporter / Re-exporter (name,address and country)
J. Traut
P. O. BOX 35576
Windhoek
Namibia

Signature of the applicant

5. Special conditions
Not valid if not certified by the Namibian customs

All imports and exports remain subject to verterinary regulations.
For live animals, this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations.

6. Name, address, national seal/ stamp and country of Management Authority
MINISTRY OF ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 1647451

	7./8. SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age /sex if live)	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported/ Quota
A	7./8. *Panthera leo* Lion	9. Skull & skin; NAPL 02/2018	10. II W	11. 2 Item	11a. /
	12. Country of origin* / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	
B	7./8. *Panthera leo* Lion	9. 2x collar bones	10. II W	11. 2 Item	11a. /
	12. Country of origin* / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	
C	7./8.	9.	10.	11.	11a. /
	12. Country of origin* / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	
D	7./8.	9.	10.	11.	11a.
	12. Country of origin* / Permit No. / Date	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
** Only for specimens of Appendix-I species bred in captivity or artificially progated for commercial purposes
*** for pre-Convention specimens

13. THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

18/12/2018 — Date

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
18 - 12 - 2018
1647451
WINDHOEK
Private Bag 13306 • Windhoek
Tel: 2842111 • Fax: 258861

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export | Date | Signature | Official stamp and title

Original

Namprint: 2308

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

Memorandum

To: The File

From: Chief, Branch of Permits, DMA

Subject: Enhancement finding for the import of a sport-hunted African lion trophy taken in Namibia in 2018 (PRT-84928C)

Background:

On March 27, 2018, Mr. Dwight Steven Van Brunt submitted an application to the U.S. Fish and Wildlife Service (Service) requesting authorization to import one male African lion (*Panthera leo melanochaita*) sport-hunted trophy taken by Mr. Van Brunt on the property of the Kalahari Game Lodge (KGL), Karas Region of Namibia on May 2, 2018. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act). The Act prohibits any person, subject to the jurisdiction of the United States, from conducting certain activities with any endangered species listed under the Act [50 CFR 17.21]. These activities include, among others, import, export, take, interstate or foreign commerce, and apply equally to both wild and captive populations. Otherwise prohibited activities may be permitted, but only if the Service finds that the activity is for purposes that enhance the propagation or survival of the affected species and is determined to be consistent with the purpose of the Act [Section 10(d)]. The primary purpose of the Act is the conservation and continued existence of wild populations of endangered species and the ecosystem on which they depend [Section 2]. Therefore, it is a requirement of the Act and its implementing regulations that the proposed activities of the applicant reduce the threat of extinction or benefit the species in the wild. The issuance criteria at 50 CFR 17.22(a)(2) must be met for a permit to be issued.

After evaluating the information submitted with the application, information provided by the government of Namibia, and other information available to the U.S. Fish & Wildlife Service (Service), the Division of Management Authority (DMA) has determined that the importation of the sport-hunted trophy taken from this wild-managed lion (*P. l. melanochaita*) population within the Karas Region of Namibia on May 2, 2018, enhances the survival of the species, in accordance with the enhancement criteria under 50 CFR 17.32.

U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule effective January 22, 2016, listing the lion subspecies *P. l. leo* (Asia and western, central and northern

Africa) as an endangered species under the Endangered Species Act (Act or ESA), and listing the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita,* whose range includes Namibia, is listed as threatened under the Act and is regulated under an ESA species-specific 4(d) rule [50 CFR 17.40(r)].

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the species-specific 4(d) rule contains the applicable prohibitions and exceptions for the threatened species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita,* all of the prohibitions and provisions of 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita* specimens (50 CFR 17.40(r)). The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act.

Permits may be issued to carry out otherwise prohibited activities involving threatened wildlife species under certain circumstances. Regulations governing permits for threatened species, such as *P. l. melanochaita,* are codified at 50 CFR 17.32.

Of particular relevance to this application, importation of any *P. l. melanochaita* specimen, including a sport-hunted trophy, is prohibited (50 CFR 17.40(r)(1)-(2); 50 CFR 17.31(a); 50 CFR 17.21(b)). A threatened species import permit under § 17.32 is required for the importation of all specimens of *P. l. melanochaita* (50 CFR 17.40(r)(1)-(2)). Accordingly, as we explained when finalizing the 4(d) rule for *P. l. melanochaita*, the Service may authorize the import of a sport-hunted lion trophy from Namibia, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild ((USFWS 2015; 80 Fed. Reg. 79999); 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance under 50 CFR 17.32. With applications to import sport-hunted trophies, however, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a determination under the Act regarding whether to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information.

The Service has made the required enhancement finding based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

General considerations:

The Service's threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies).

In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Namibia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Van Brunt's application involving a *P. l. melanochaita* sport-hunted trophy taken from the property of Kalahari Game Lodge (through Jamy Traut Hunting Safaris, Windhock, Namibia), Karas Region, which borders the Kgalagadi Transfrontier Park, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport-hunting, the Service considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, and has, therefore, considered these principles in conjunction with our threatened

species issuance criteria for this determination of enhancement. The IUCN document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The IUCN document lays out the following five guiding principles:

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species. As noted in Namibia's NW Lion Management Plan, trophy hunting of lions can be a very lucrative and selective option for turning what is considered a problem by communities into an asset.

In evaluating whether the importation of Mr. Van Brunt's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Namibia's management programs for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. The primary threat to African lions in Namibia currently is human-lion conflict, which Namibia is addressing as evidenced by its 2017 NW Lion Management Plan, while striking a balance between conservation priorities and the needs of people who live with wildlife.

When examining a management program and whether a trophy taken as part of that program meets the issuance criteria, we evaluate a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat ***or*** increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable off-take within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting areas are managed to ensure the long-term survival of the lion, its prey base, and habitat.

Hunting, if properly conducted and well managed, can generate significant economic benefits that contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examine if the trophy hunting provides financial or other resource assistance/capacity to the wildlife department to carry out elements of its management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also consider how a U.S. hunter's, in this case, Mr. Van Brunt's, participation in the hunting program contributes to the overall management of lions within a country.

Our review includes an evaluation of whether a management program for *P. l. melanochaita* addresses, but is not limited to: evaluation of population levels and trends; the

biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries, such as Namibia, that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local human communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program can provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On January 13, 2016, the Service sent a letter to Namibia's Ministry of Environment and Tourism (DEA) with a list of questions (USFWS 2016) that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Namibia, and whether that management addresses the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting the importation of sport-hunted lion trophies.

In response to our January 13, 2016, letter, the government of Namibia provided two documents: the Lion Conservation Strategy for Namibia, and the Human-Lion Conflict Management Plan for North West Namibia. In November 2018, Service representatives from DMA participated in the Wildlife Consultative Forum in Uganda, during which time, they met with government representatives of Namibia and received updated information on the status and management of lions in Namibia. Collectively, these sources of information, the Service's final rule providing protections for the lion under the Act (80 Fed. Reg. 79999), relevant information obtained from other sources, and Mr. Van Brunt's application provide the basis for this finding.

***Management of Lions in Namibia*:**

Namibia's strategy for wildlife conservation aims to ensure people derive benefit from wildlife, and the protection of wildlife is funded by balancing development and conservation needs as a "sustainable socio-ecological system". Forty-four percent of Namibian land is under some form of conservation, and the government employs a different strategy for each land-use type, with the level of protection and community-engagement varying among them:

1) National Parks: Provide the highest level of wildlife protection with low community engagement; funded by the government, non-governmental organizations, and through tourism.
2) Communal Conservancies/Community Forests: Managed sustainable use of wildlife/environment, high community involvement; funded through use of wildlife (such as trophy hunting) and indigenous products; serve as buffer zones around national parks and provide corridors for migration.

3) Freehold/Private Conservancy Game Farms (Ranches): Managed sustainable use of wildlife/environment, owner-driven, no community involvement; funded through use of wildlife (such as trophy hunting) and indigenous products; serve as buffer zones around national parks, and corridors for migration.

The government of Namibia has afforded legal user rights to the wildlife (not just the land) outside of National parks, which has created the opportunity for land owners and communities to benefit through the conservation of wildlife (State Department cable, April 6, 2018).

Hunting plays an important role in Namibia's managed, sustainable use of wildlife. Within communal conservancies, hunting provides economic incentives for communities to manage wildlife responsibly. Private hunting ranches and professional hunters are subject to strict governmental regulation; they are careful to sustainably maintain wildlife on their land, for both business and conservation reasons. Private ranch owners promote ethical hunting, which involves targeting animals of the proper age and sex to sustain the species population (State Department cable, February 1, 2018).

Hunting in Namibia is conducted under a standard code of ethics maintained by the Namibia Professional Hunting Association (NAPHA). All hunting areas are under the strict supervision of the Directorate of Resource Management of Namibia's Ministry of Environment and Tourism (MET). The hunting outfit identified in Mr. Van Brunt's application is a member of the NAPHA (http://www.napha-namibia.com, accessed March 4, 2019). Members are expected to hunt strictly in accordance with the ethical principles as stipulated in NAPHA's Hunting Code. According to the NAPHA website, Hunting Professionals are at all times encouraged to act responsibly towards nature, wildlife and the local population. To qualify as a Hunting Professional in Namibia, applicants must pass both theoretical and practical hunting examinations set by the MET.

Danene van der Westhuyzen, President of NAPHA, presented a "best practice" case study at the 2018 African Wildlife Consultative Forum, demonstrating how placing a value on wildlife led to a total change in attitude towards wildlife by land owners and custodians. Success was achieved through a multi-faceted business model, including conservation hunting, management hunting, meat production, live sales of surplus animals, and tourism. Benefits to land owners from hunting made wildlife an attractive land-use option, encouraging people to maintain or restore wildlife habitat and populations. In 2015, NAPHA spearheaded the formation of the Hunters United Against Poaching Trust for the protection of all wildlife in Namibia through innovative fundraising (AWCF 2018).

In July 2017, the MET published its Lion Conservation Strategy for Namibia. This is the first Namibian species management plan for the Lion, and its development follows from and is guided through the National Policy on the Conservation and Management of Large Carnivores of 2014. The Policy outlined the following strategies:

- Targeted and sustained Research and Monitoring
- Species-specific Large Carnivore Conservation and Management Planning
- Sustainable Utilization of Large Carnivores
- Management of Human-Carnivore Conflict
- Stakeholder Engagement Platforms
- Standard Operational Procedures
- Large carnivore conservation at landscape level.

One of its objectives is to reduce and minimize human-lion conflict (one of the main threats in Namibia) in a participatory, responsible, and accountable manner. Recognizing the need to address and minimize human-lion conflict, in July 2017, the MET published a Human-Lion Conflict Management Plan for North West Namibia. Permits are issued to kill "problem lions" in registered conservancies for trophy hunting. Namibia participates in community-based natural resource management programs (e.g. the Conservancy Self-Insurance Scheme, the Human Wildlife Conflict Policy) that allow "problem lions" to be sold for trophy hunting outside of and along the borders of protected areas. Fees are payable to conservancies and to a fund that has been established for wildlife conservation and rural community development projects (CITES 2014).

Namibia is a Regional leader on transboundary wildlife management, particularly in the northeastern Kavango-Zambezi Transfrontier Conservation Area (KAZA) and along the borders with South Africa and Angola (State Department cable, April 6, 2018).

***Governance of Lions in Namibia*:**

The two documents provided to the Service in July 2017 build on laws and policies that govern Namibia's management of its resources, including the Nature Conservation Ordinance, 1975, and the 2007 Policy on Tourism and Wildlife Concessions on State Land, to protect and manage its wildlife and natural resources. Under the Nature Conservation Ordinance, Ordinance 4 of 1975 of Namibia, the African lion is a classified as a Specially Protected Species. As a Specially Protected Species, one of the protections conveyed to African lions is the prohibition of hunting in game parks and nature reserves, ". . . No person shall, without the written permission of the Minister, hunt any animal in any game park or any nature reserve: provided that a dangerous animal may be killed in defense of a human life or to prevent a human being from being injured. Any person who contravenes or fails to comply with any provision of subsection (1) or any condition, requirement or restriction of any permission granted thereunder, shall be guilty of an offence and liable on conviction . . . to a fine not exceeding R20 000 or to imprisonment for a period of not exceeding five years to both such fine and such imprisonment if such offence relates to the hunting of any other specially protected game."

The Nature Conservation Ordinance, 1975 provides other protections to the African lion as a Specially Protected Species, in particular, the Ordinance provides for the prohibition of hunting in private game parks, "Notwithstanding anything to the contrary in this Ordinance contained, but subject to the provisions of Chapter IV, no person shall without the written approval of the Minister hunt any game or any other wild animal or bird in a private game park". Additionally, the Ordinance states that no person other than the lawful holder of a permit granted by the Minister shall at any time hunt any specially protected game, ". . . and any person who contravenes or fails to comply with any provision of subsection (1) or any condition, requirement or restriction of a permit granted in terms of this section shall be guilty of an offence and liable on conviction- (a) to a fine not exceeding R200 000 or to imprisonment for a period not exceeding twenty years or to both such fine and such imprisonment if such offence relates to the hunting of any elephant or rhinoceros; or (b) to a fine not exceeding R20 000 or to imprisonment for a period not exceeding five years or to both such fine and such imprisonment if such offence relates to the hunting of any other specially protected game."

Namibia is also a Party to CITES and the Convention on Biological Diversity (CBD). Under CITES, certain criteria must be met before Appendix-II-listed species can be exported, including a

finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. Before an export permit may be issued by the Namibia CITES Management Authority, that non-detriment finding must be made; we have received a copy of Mr. Van Brunt's CITES export permit issued by the CITES Management Authority of Namibia.

In addition, Namibia is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

***Current Lion Status in Namibia*:**

When the Service listed lions in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. Historically lions were distributed throughout Namibia; however, they were extirpated from most parts of the country by the turn of the 20th century. Due to the current focus of wildlife management practices in Namibia, additional habitat loss has been minimized. The lion population in Namibia has increased as a result of Namibia's standards and mechanisms to maintain biodiversity, encouragement of more stable prey bases, and most importantly, reduced loss of lions through human-lion conflict.

Namibia is currently home to a population of approximately 1000 lions, subdivided into two main populations, the Etosha-Kunene population and the Khaudum-Zambezi population. A number of small populations exist on private reserves; most notable is the population on a private reserve in the Kalahari on the edge of Etosha National Park -- Ongava and Etosha Heights Safari Lodge.

Three categories of lions are found in Namibia: wild free-roaming lions in large and open protected areas and other lands used for conservation purposes; managed lions free-roaming in small, fenced reserves; and captive lions that are entirely dependent on humans for their survival.

Hunting and Utilization:

According to the Namibia Professional Hunting Association, the following is required prior to trophy-hunting a lion in Namibia (http://www.napha-namibia.com/legal-information/trophy-hunting-in-namibia, accessed March 6, 2019):

- Permits must be issued prior to the hunt commencing;
- A separate permit must be issued for each individual hunting client;
- An extra, special permit is required for the large cats (leopard, cheetah, and lion).
- It contains an additional list of conditions;
- A permit must be completed in full by the hunting client and the hunting professional (wounded or lost animals must also be indicated on the permit);
- Permits are issued by the MET only; and
- A maximum of two trophies per species may be harvested, per hunting client, per permit.

- All trophy-hunting operators must be registered with the Namibia Tourism Board (NTB).
- Hunting with dogs is not permitted.

According to the CITES database, Namibia has not set a specific annual quota for export of lion trophies[1]. However, authorizations for hunting lions are addressed on a case-by-case basis by Namibia's MET[2]. Reserves maintaining wild-managed lions must submit an application to the provincial authorities requesting a permit. Professional Hunters are obligated to record all completed hunts in a professional hunting register, and this register is used to compile provincial reports on the number of lions taken annually. The level of off-take is also evaluated in the management of the meta-population to ensure that only those animals that no longer meet management goals are removed from the population. These animals are typically older lions that have successfully bred and raised several litters of kittens.

Evaluation:

As stated earlier, the Service evaluates each application in accordance with its threatened species permitting regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that the proposed import of the wild-managed lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Lions are a key component of the conservation paradigm in Namibia. According to the Namibian Association of Community Based Natural Resource Management (CBNRM) Support Organizations (NACSO)[3], the MET and conservancies work together to monitor wildlife, with the Natural Resources Working Group of NACSO providing technical assistance. The MET issues quotas for the sustainable use of wildlife based upon animal populations and other factors, such as drought. For example, it may be considered prudent to make use of wildlife before it dies as the result of drought. Every aspect of wildlife utilization is subject to strict regulation by the MET, and the Namibia Professional Hunting Association (NAPHA) works to promote and ensure ethical hunting and professional standards. Based on the information available to the Service, the presence of large private reserves such as the KGL, which are authorized by Namibia's MET for trophy-hunting of lions improves the probability of success for lion survival as a whole.

The KGL consists of 40,000 hectares, and although it is fenced, it borders the Kgalagadi Transfrontier Park on Namibia's southeaster border, and lions still can enter the property. As of March 2018, the KGL property maintained approximately 22 lions; at that time, it was determined that it was necessary to remove two older males on the property in order to properly maintain the

[1] https://cites.org/eng/resources/quotas/export_quotas?field_party_quotas_tid=Namibia&field_full_name_tid=Panthera+leo&field_export_quotas_year_value%5Bvalue%5D%5Byear%5D=2018&items_per_page=50, accessed March 6, 2019.

[2] https://cites.org/eng/resources/quotas/export_quotas?field_party_quotas_tid=Namibia&field_full_name_tid=Panthera+leo&field_export_quotas_year_value%5Bvalue%5D%5Byear%5D=2018&items_per_page=50

[3] NACSO is an association comprising 8 non-government organisations (NGOs) and the University of Namibia.

balance between the available prey and habitat. The applicant submitted an application to hunt one of these animals deemed surplus to the population. The need to protect lion populations from poaching and provide on-the-ground oversight, including 24-hour surveillance, can be prohibitively expensive. The proceeds from trophy-hunting of an older male lion such as the one hunted by Mr. Van Brunt will assist in providing the protection and oversight needed, as well as management of the lions' prey base, and serve to enhance the survival of the species.

Namibia has put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in Namibia. The objectives of the Lion Conservation Strategy and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Namibia has established for managing lions. The funds generated by the U.S. hunter's participation (i.e., those of Mr. Van Brunt), contribute to the ongoing benefits that Namibia's conservation strategy provides to lions in the wild; this strategy includes the biological management of lions on private reserves.

Therefore, the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the lion sought to be covered by the permit.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

In evaluating the information provided by the Namibian government and other sources, it appears that the hunting program in Namibia is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction under the Act. The fenced reserves, including KGL[4], and national parks are maintaining habitat for lions and ensuring that there is no further habitat loss, provided that the reserves can remain economically viable. In order to maintain a viable population of wild and wild-managed lions, the parks and reserves must maintain biodiversity and a sustainable prey base. Finally, while there is still controversy over the extensive utilization of fencing in Namibia, it does reduce human-lion conflicts as well as the number of lions killed in retaliation for killing livestock. Therefore, the management of lions on these reserves and the limited hunting of lions under this management program contributes to the on-going survival of the species in Namibia. In addition, the off-take of this wild-managed lion provides an indirect benefit to the overall lion population by helping to support the reserve where lion populations participating in meta-population management are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

Namibia closely monitors and controls the harvest of wild and wild-managed lions. According to the Namibian Association of Community Based Natural Resource Management (CBNRM) Support Organizations (NACSO)[5], the MET, and conservancies work together to monitor wildlife, with the

[4] http://www.kalaharigamelodge.com.na/wildlife-and-sustainability/#ecology, accessed March 6, 2019

[5] NACSO is an association comprising 8 non-government organisations (NGOs) and the University of Namibia.

Natural Resources Working Group of NACSO providing technical assistance. Every aspect of wildlife utilization is subject to strict regulation by the MET, and the Namibia Professional Hunting Association (NAPHA) works to promote and ensure ethical hunting and professional standards. Based on the information available to the Service, the presence of large private reserves such as the KGL, which are authorized by Namibia's MET for trophy-hunting of lions improves the probability of success for lion survival as a whole. Additionally, since the protection for African lions under the U.S. Endangered Species Act was put into place, the government of Namibia has developed additional conservation mechanisms for the African lion: the Lion Conservation Strategy for Namibia, and the Human-Lion Conflict Management Plan for North West Namibia.

The area where this lion was taken (the KGL) consists of 40,000 hectares. Although it is fenced, it borders the Kgalagadi Transfrontier Park on Namibia's southeaster border, and lions still can enter the property. The need to protect lion populations from poaching and provide on-the-ground oversight, including 24-hour surveillance, can be prohibitively expensive. The proceeds from trophy hunting of an older male lion such as the one hunted by Mr. Van Brunt will assist in providing the protection and oversight needed, as well as management of lions' prey base, and will serve to enhance the survival of the species.

Namibia has put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in Namibia. The objectives of the Lion Conservation Strategy and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Namibia has established for managing lions. The harvesting of this lion was conducted in accordance with MET's laws and regulations[6]. Therefore, the issuance of an import permit for a wild-managed lion legally hunted on the property of the KGL under these authorities would not conflict with any programs intended to enhance the survival probably of the species in Namibia.

The need to protect lion populations from poaching and provide on-the-ground oversight, including 24-hour surveillance, can be prohibitively expensive. The proceeds from trophy-hunting of an older male lion such as the one hunted by Mr. Van Brunt will assist in providing the protection and oversight needed, as well as management of lions' prey base, and serve to enhance the survival of the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

Namibia is home to only a small population of around 1000 lions, but according to Namibia's 2017 Lion Conservation Strategy, its lion population in Namibia has slowly increased over the past 20 years. This was mainly due to the expansion of lions into the Kunene Region. In other parts of Namibia, lion habitat is threatened through land use change and fragmentation resulting in human-wildlife conflict and reduction in range available for lions. The Namibian lion population can be subdivided into two populations, the Etosha-Kunene population and the Khaudum-Zambezi population. In addition, there are a number of small populations on private game reserves, such as the KGL.

While the larger free-ranging population of wild lions in the national parks receive only limited direct management activities, reserves such as the KGL require management that is more intensive

[6] http://www.met.gov.na/services/permits-registrationscertificates-licences/173/, accessed March 6, 2019

in order to mimic natural biological and ecological roles of lions. All indications show, that given the threats identified by the Service when listing the species as threatened under the Act, the presence of these reserves, including the KGL as well as the parks, is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. While the concept of lions behind fences has both benefits and drawbacks, it appears to be a major contributor to the on-going survival of lions in the wild in Namibia. While open and unmanaged habitat not impacted by human intervention would be the ideal condition for lion populations in Namibia, as well as throughout its natural range, this is not a viable option within Namibia.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt that Mr. Van Brunt has undertaken will contribute to reducing the threat of extinction of lions in Namibia. The KGL consists of 40,000 hectares, and although it is fenced, it borders the Kgalagadi Transfrontier Park on Namibia's southeaster border, and lions still can enter the property. As of March 2018, the KGL property maintained approximately 22 lions; at that time, it was determined that it was necessary to remove two older males on the property in order to properly maintain the balance between the available prey and habitat. The applicant submitted an application to hunt one of these animals deemed surplus to the population. The need to protect lion populations from poaching and provide on-the-ground oversight, including 24-hour surveillance, can be prohibitively expensive. The proceeds from trophy-hunting of an older male lion such as the one hunted by Mr. Van Brunt will assist in providing the protection and oversight needed, as well as management of lions' prey base, and serve to enhance the survival of the species.

Namibia has put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in Namibia. The objectives of the Lion Conservation Strategy and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Namibia has established for managing lions. It appears that the permitting activities through Namibia's MET and the implementation of the Lion Conservation Strategy will ensure the long-term survival of lions. The use of hunters such as Mr. Van Brunt in managing the populations on these reserves, particularly taking an older male, is an important element of the success of lion management in Namibia.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduced the threat of extinction facing lions in Namibia.

17.32(a)(2)(v): <u>The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:</u>

There are numerous opinions on the impact that hunting as a management tool has on a species. Based on reviewing comments made during the ESA listing process for lions, as well as information obtained from available literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. A large number of comments from some non-governmental organizations (NGOs) and the public indicate that they oppose hunting lions. However, this opposition is primarily based on the perceived ethics of hunting and are not germane to our review process for this application.

Therefore, although some members of the public are opposed to trophy-hunting of lions, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that the legal harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

Based on our understanding of the permitting process implemented by Namibia's Ministry of Environment and Tourism, there are requirements in order for this activity to occur by the hunter and the landowner[7]. Hunting in Namibia is conducted under a standard of ethics maintained by the Namibia Professional Hunting Association (NAPHA). In addition, one of the strategic actions of the Lion Conservation Strategy is to ensure trophy hunting contributes directly to lion conservation by providing lion hunting quotas only to landholders that have well managed resident lion populations on their land. This oversight by the MET and the implementation of the Lion Conservation Strategy establishes a framework in which reserves manage their wildlife. The long-term survival of lions, at least in Namibia, is tied directly to the success, both ecologically and economically, of the reserves. The reserves that maintain wild-managed lions, including the KGL, carry out limited hunting in order to maintain the ecology of the ecosystem, and have the expertise and facilities to maintain lions successfully.

Therefore, based on the information available to the Service, the applicant has hunted on a properly permitted reserve that carries out their management practices in accordance with national and provincial regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective states in the application.

Conclusion:

Given the current status of wild and wild-managed lions within Namibia and the level of management and oversight provided to them, the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The information reviewed indicates that Namibia is sustainably managing its African lion population; and limited, permitted hunting on private reserves is a part of Namibia's management and conservation strategy. The applicant provided information that he hunted on a properly licensed reserve that is actively managing lions in a manner that will maintain the species on the reserve, and through the national management plan, in a manner that mimics natural processes. The Service has examined the overall conservation and management of the subspecies Namibia, where the specimen originated, and we found that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). We believe that Namibia's management of lions conforms with the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012).

[7] http://www.met.gov.na/services/permits-registrationscertificates-licences/173, accessed March 6, 2019.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service finds that Namibia's trophy-hunting program is managed to ensure the long-term survival of the species and we are able to make a determination that the import of this sport-hunted trophy will enhance the propagation or survival of the species. In conclusion, the Service is able to authorize the import of one male lion trophy taken in Namibia, to Mr. Dwight Steven Van Brunt, Kalispell, Montana. This finding is made based on the reserve where the lion was taken, having been properly permitted and in compliance with national and local regulations.

Amy Brisendine
Branch of Permits
Division of Management Authority

3-15-19
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

African Wildlife Consultative Forum (AWCF). 2018. Minutes of the 16th African Wildlife Consultative Forum (AWCF) Speke Resort, Munyonyo – Kampala, Uganda, 12-16 November 2018.

CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora). (2014). CITES periodic review of the status of African Lion across its range. Twenty-seventh meeting of the Animals Committee Veracruz (Mexico), 28 April – 3 May 2014 Interpretation and implementation of the Convention Species trade and conservation Panthera Leo - Report of Kenya and Namibia (prepared by Samuel Kasiki, PhD (Kenya), Africa Regional Representative to the CITES Animals Committee, and Elly Hamunyela (Namibia)). 53 pp.

IUCN Species Survival Commission. 2012. IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives. Ver. 1.0, IUCN, Gland.

IUCN Species Survival Commission (SSC) Cat Specialist Group. (2006a). Regional Conservation Strategy for the lion (Panthera leo) in Eastern and Southern Africa. 60 pp.

IUCN Sustainable Use and Livelihoods Specialist Group. 2016. Briefing Paper: Informing Decisions on Trophy Hunting. IUCN.

Republic of Namibia, Ministry of Environment and Tourism. Lion Conservation Strategy For Namibia. July 2017. 23 pp.

Republic of Namibia, Ministry of Environment and Tourism. Human-Lion Conflict Management Plan For North West Namibia, July 2017, 62 pp.

Republic of Namibia, Ministry of Environment and Tourism. Nature Conservation Ordinance 4 of 1975, 61 pp.

Republic of Namibia, Ministry of Environment and Tourism. http://www.met.gov.na/services/permits-registrationscertificates-licences/173, accessed March 6, 2019

USFWS (2015) Final ESA listing rule for *Panthera leo leo* and *P. I. melanochaita*. 80 Fed. Reg. 79999.

USFWS (2016). Email from Sandra Farkas to Ministry of Environment and Tourism, January 2016.

US Department of State. 2018. Namibia's Wildlife: Policy, Programs, and Messaging for Future, USG Engagements Cable from AMEMBASSY WINDHOEK. April 6, 2018.

US Department of State. 2018. Guns, Game, and Growth: How Namibia's Professional Hunting Drives Wildlife Conservation and Promotes U.S. Trade, USG Engagements Cable from AMEMBASSY WINDHOEK, February 1, 2018.

LION NAMIBIAN ESA TROPHY

Permit Number: MA84928C-0
Effective: 03/15/2019 Expires: 03/14/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coghlan
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

DWIGHT STEVEN VAN BRUNT
(b)(6) [redacted]
KALISPELL, MT 59901
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted: Not applicable

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Namibia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. Trophy must have been taken during 2018.

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Namibia.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Namibia.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. This permit can be photocopied.

Permit Number: MA84928C-0
Effective: 03/15/2019 Expires: 03/14/2020

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

APR 13 2018

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
PANTELIDIS	ANASTASIOS	N\A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
WATERFORD	OH	45786	WASHINGTON	U.S.A.

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) [redacted] 04/04/2018

Signature of appli[redacted]ocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Same as page 1

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
1)Panthera leo melanochaita, lion2)Crocodylus niloticus, Nile crocodile 3)Imbabala-Tragelaphus scriptus, bushbu

b. Sex (if known).

1) male 2) male 3) male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

o

N\A

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Country of Mozambiqe, Province of Tete, District of Zumbo, City of Zumbo,
Ranch: Chawalo Safaris Lodge in Zumbo, Tete, Mozambique

b. Date wildlife was hunted:

Lion was harvested on 7/30/2016
Crocodile was harvested on 8/02/2016
Bushbuck was harvested on 8/03/2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Outfitter/guide was Russell Lovemore and Jaco Strauss from Chawalo Safaris

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

EMIAC MOZ LDA
COMPLEXO TESTAFRICA
BAIRRO DA SOALP
CHIMOIO
MOZAMBIQUE

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

All permits/licenses were held and managed by the outfitter.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Senta Van Antwerp
Business Name: EMIAC MOZ LDA
Address: COMPLEXO TESTAFRICA
City: BAIRRO DA SOALPO
State/Province: CHIMOIO
Country, Postal Code: MOZAMBIQUE

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED SHEET

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

SEE ATTACHED SHEET

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

SEE ATTACHED SHEET

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: _(b)(6)_____ Date: 4/4/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9) a. Do you have any information regarding the population status or trend data on the species hunted?

I do not have any official data on this. What I can say and it will be repeated below, is the fact that we have been incredibly successful in curbing poaching. In the 7 years that we have operated and hunted on Chawalo game numbers have increased dramatically. Our area reaches 800 000 acres in extent, as per safari we were aware of 4 different lion males as well as several females moving within our limited coverage of the area. If we were to consider the average home range of lion males specifically there is every reason to be extremely optimistic in terms of numbers as we covered a total area of roughly 70 000 acres on this safari.

We have subscribed to the ethics and standard of only utilizing lion males of 7 years and older which research has proven as conducted in Tanzania limits and virtually nullifies infanticide, by continuing with these basic management principles as well as the highly controlled off take of 1 lion male per annum on a total of 800 000 acres, there is no reason to assume that our population is under stress or pressure. Furthermore every specie hunted is inspected and aged by means of jaw, should we be deemed to harvest juvenile or continually harvesting prime breeding animals our quota will be reduced for the following season, taking females by accident or mistake is also punished with heavy fines in excess of $5000.

b. In order to hunt, you likely paid for licenses or trophy fees. Do you have any information on how those funds were used by either the landowner, community, or government?

Yes, we did pay for hunting licenses and tag. One third of the tag fees go to the local population, that inhabit the area and villages on the periphery, one third goes to the Tchuma Tchatu program a program that train and equip scouts to protect the area. So this very program train and equip Scouts that compliment our scouts on the ground to curb poaching.

Tchuma Tcatu is a community program, these communities would have zero benefit from wildlife that they share the areas with and I shudder to think what would happen if this incentive or program was to be abolished.

In short these areas would turn to livestock land and we would effectively lose wildlife habitat as the wildlife occurring in these areas would turn into a liability to local communities, this program has been successful to the point of giving wildlife a tangible value within local communities, in cooperation with us as outfitters operating on these areas.

A portion of funds generated from foreign hunting activities by the outfitter also gets paid to the community by the outfitter once a year in November or December and there is a local committee that decides how these funds will be spent within the conservation area as there are ten villages that need to benefit from this. It is used for schools, clinics, water wells and the like. We have also received donations from SCI and they have built and mobilized a clinic which operates on our western

boundary, on the Luangwa river. We have been extremely successful in involving our local communities in a positive way, I can not stress the importance of community involvement enough, in an impoverished country such as Mozambique this is the of the utmost importance.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

As outfitter we have initiated a program whereby a community levy is asked from each foreign hunter this over and above funds generated from the community tax levied to each hunter, is then applied to also improve and benefit the local community on condition that they assist in the protection of the local wildlife by assisting in limiting poaching, controlling the wild fires primarily.

They will also receive rewards and benefits for sound information provided on Lion, Leoapard and elephant movements in the area.

Currently we employ a total of 25 full time anti-poaching scouts these scouts are paid for by the outfitter and inherently by our hunting clients, we have succeeded in curbing poaching to a large degree with countless muzzle loaders (homemade) as well as snares and other equipment used for poaching being confiscated on information supplied directly by members of our local community, and also from our armed - mobilized anti-poaching teams. There is no doubt that poaching could be brought to a complete stop if we were able to encourage more hunters to venture into our area in Mozambique.

As a further note when we took over the area 7 years ago we had knowledge of roughly 40 buffalo, we now have a solid heard of around 250 around camp with various smaller satellite herds scattered throughout the areas entirety, small game such as Duiker, impala, Kudu, Roan, warthog have also made a remarkable comeback, and with that our predator numbers have done exceptionally well. It is of cardinal importance that we continue to fight the illegal trade in wildlife products and the continued support of the international trophy hunting market and our loyal clients and organizations such as SCI and DSC will ensure the resources for us to do so.

The 1 lion, 2 leopard, Crocodile, buffalo and plains game that we receive on quota and the funds generated from these species is integral to the continued survival of wildlife habitat, we need to encourage USFWS to seriously consider an amendment to the lion import policy as it will either aid in the demise or the survival of our natural resources.

My best always,

Jaco Strauss, PH/Outfitter

To whom it may concern,

I feel compelled to write this statement about my many trips to Africa. There is great beauty as well as unimaginable poverty and destruction. While traversing the continent you see the many villages, the wildlife and the ever changing landscape. Over the years some of the familiar areas have been desolated by human incursion from the slash/burn farming, clear cut timbering with ALL trees going to China and strip mining for coal. Some areas are "protected" with the local or national parks label but there is little supervision and the constant human encroachment and poaching result in an ever dwindling wildlife populations. On every trip to Africa with the exception of this one, there were always snares, traps and other cruel methods to poach the game. In the field I did not see or find a single example of poaching but at the lodge there was a nice collection of homemade muzzleloaders/firearms that had been confiscated or surrendered. One of the main reasons for such success are the anti-poaching units employed by Chawalo safaris. During my stay I met 2 of the traveling/patrolling anti-poaching units.

What makes the Chawalo Safaris area so special is the care, effort and expense they have put into making it the most pristine wildlife area that I have ever encountered. There is still a rather sizable human presence but through extensive interactions, education, acts of kindness and monetary rewards the local people have made great strides in preserving the wildlife especially with their efforts to stop all poaching. The funds that are generated through hunting have allowed Chawalo to establish a sound, renewable resource that brings much needed funds to an otherwise poor area.

A side note for consideration, we encountered a couple of young male lions, 2-4 years of age, traveling together. Before I even had a chance, Jaco Strauss (P.H.) said they were too young and he would not allow me to take one. If the cat wasn't at least 7 years old we would not be shooting it. That strong conviction to only harvest mature animals was a refreshing and pride inducing moment. The lion that was eventually harvested was at least 7 years old and a loner. He was mature but it was quite obvious that he was declining in health and stature. The perfect animal to harvest.

Another area where hunting funds have allowed Chawalo to assist in and establish harmony amongst the locals is the creation of Chissavo Clinic. A small medical clinic that treats the locals (and some not so local) residents. After an on-site visit, walk-through and interactions with the patients I was so impressed that I have made the decision to return and donate my services.

When making your determination for importation please consider my personal statement. Chawalo Safaris is not your average or typical outfitter. They have vastly improved the area not just for the wildlife but the locals as well. If all outfitters were half as conscientious and committed we would have a better world.

Thank you for your time,

Anastasios Pantelidis, M.D.

Nelson, Emma <emma_nelson@fws.gov>

Anastasios Pantelidis PRT #85768C

1 message

Barry, Anna <anna_barry@fws.gov> Fri, Jul 5, 2019 at 4:25 PM
To (b)(6)
Cc: Emma Nelson <emma_nelson@fws.gov>

Dear Mr. Pantelidis,

The following is in response to your phone call today.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

The application is assigned to Emma Nelson of our office, if any additional information is needed for the application she will contact you directly.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAY 11 2018

LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kampeter	Andrew	Joseph	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Wardsville	Missouri	65101	Cole	United States

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6) 05/04/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Andrew Kampeter (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit. NA

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo Melanochaita, Southern African Lion

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   South Africa, Zululand, Kwa Zulu-Natal Province
   Mkuze Fall Private Game Reserve, Nearest City = Pongola or Nongoma

   b. Date wildlife is to be hunted:
   July 18, 2018 thru Aug 4, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Garry Kelly Safaris, Professional Hunter Sean Kelly

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   NA

   b. Date wildlife was hunted:
   NA

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

NA

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

NA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NA Dont Have permits yet

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Rupert Dedekind
Business Name: Universal Trophey Service
Address: Plot 114
City: Bashewa
State/Province: Pretoria
Country, Postal Code: 0056

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
Attached paper

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
Attached papers

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
Attached

9a) Do you have any information regarding the population status or trend data on the species hunted?

The current property forms part of the Wild Managed population of Lions in South Africa, as defined in terms of the Biodiversity Management Plan for Lion in South Africa. Furthermore, the property is contributing to the meta-population for the province of KwaZulu-Natal and subscribes to the principles for meta-population management as defined by the provincial conservation authority (Ezemvelo KwaZulu-Natal Wildlife). There are currently 18 lions on the property, of which three are available for offtake. Such offtakes will mimic natural population changes wherein old males are forced out of the pride structure. The property has had lions for the preceeding 10 years and have been managed to ensure the genetic intergrity of the prides on the property.
There are 18 lions on the concession. 5 Males, the rest are females & cubs. We have been advised that there are too many Lions on the concession & have been allocated 3 to take off.

b) In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community or government?

Hunting permit and licences fees are paid to the provincial conservation authority, Ezemvelo KwaZulu-Natal Wildlife, with such funds being utilised to manage sustainable resource use in the province. The funds assist in the processing of hunting permits wherein the sustainability of each application is assessed and approved when appropropriate.
The funds are used in various ways, but mainly for paying scouts for anti poaching initiatives, the re establishment of the species, security, upliftment of the area including fencing & roads.
The permit costs are R1000 & the concession fee is $35 000

c) Do you have information on other funding activities that are being carried out, or were carried out by the safari outfitter, professional hunter, concession holder or land owner that provide a conservation benefit to the species being hunted/species hunted?

The concession is owned by the local community and the funds generated through hunting activities assists in the upliftment of the community through job creation and food provision.
The safari outfitter funds the landowners through the concession fees paid by clients. These funds are used for the protection of game (the $35,000). Should there be no fees, there will be no protection of the game initiatives (scouts).

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported [redacted] onation, or exchange that is reasonably likely to result [redacted] rt a leopard trophy, I understand that I may only import two

(b) (6)

Applicant's signat[redacted] Date: 05/04/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD MAY 22 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
McGinnis	Michael	Joseph	JR

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Lynchburg	VA	24502	Augusta	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 3/28/18
d or stamped signatures) Date ... ure (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo, African lion, Felidae family

   b. Sex (if known).

      male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      N/A

   b. Date wildlife is to be hunted: N/A

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      N/A See #3

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      ZIMBABWE, MASHONALAND WEST, RIFA SAFARI AREA, HURUNGWE CONSERVANCY (S16119 B2E029)

   b. Date wildlife was hunted:

      20 MAY 2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
SKIN (LIFE SIZE MOUNT WITH CLAWS); SKULL

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
TROPHY CONSULTANTS INTERNATIONAL (T.C.I)

4 JOSIAH CHINAMANO ROAD, BELMONT, BULAWAYO, ZIMBABWE

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: TROPHY CONSULTANTS INTERNATIONAL
Business Name:
Address: 4 JOSIAH CHINAMANO ROAD
Address: BELMONT
City: BULAWAYO
State/Province:
Country, Postal Code: ZIMBABWE

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.
See US Dept of Interior document of 04/11/2017.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] Date: 3/28/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Michael McGinnis
(b) (6) [redacted]
(b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA

OCT 11 2017

Memorandum

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018

After evaluating the available information from the Government of Zimbabwe, other information available to the U.S. Fish and Wildlife Service (Service), and comments received from interested parties, the Service has determined that permits for the importation of sport-hunted trophies of wild lions (*Panthera leo melanochaita*), which are threatened under the Endangered Species Act (ESA), taken in Zimbabwe during the 2016, 2017, and 2018 calendar years meet the enhancement criteria under the Service's regulations at 50 CFR 17.32. Therefore, applications received for import of such specimens will be considered to have met this requirement. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized. The Service will reassess the situation in Zimbabwe towards the end of the 2018 season to determine if hunts conducted in 2019 and beyond continue to meet the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the ESA was warranted and proposed a rule under section 4(d) of the ESA to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the ESA) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under section 4(d) of the ESA, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion

subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the ESA and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the ESA to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, although individual import permits will be evaluated and issued or denied for each application. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, the Service encourages the submission of information from individual applicants. We rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)) , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies.

Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not

perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* are expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding for Lions in Zimbabwe:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC)*

Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the

CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for the present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA's mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation

area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the ESA, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach et al. 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward et al. 2007). Outside of protected areas, the lion's prey base is much reduced (du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations

also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96% of the all national parks) and safari areas (92% of all safari areas). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lion are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014 used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the

only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on the each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the ESA for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The

quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "(t)he costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implement a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari-hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural

communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests average 2.7% of adult male lions annually. This percentage has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe, were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further,

according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of 0.3 ± 0.1/100 km^2 for female lions; during the same period, actual offtake was lower at 0.08 ± 0.1/100 km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a five-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore,

sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016), only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015).

As agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 and 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters accounted for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport hunters conduct lion hunts in these areas; if so, the Service is not aware if sport hunters are exempted from the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System (TRAS) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account

fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria based on information available to the Service, we have been able to determine that sport-hunted lion trophies taken in 2016 and 2017 would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in BVC and SVC during 2005-2015. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to local communities, which incentivizes them to conserve the African lion. In the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted;

ZPWMA (2016) reports that the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of SVC from cattle to wildlife (du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. Although U.S. hunter participation in lion hunts is not enough to make or break the industry, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term negative impact.

Further, through the *Strategy and Action Plan*, Zimbabwe has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, and revise our finding as appropriate.

Therefore, based on the information available to the Service. and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit being requested is adequate to justify removing lions from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million

hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserve the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge et al. 2007, Whitman et al. 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based quota-setting process. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounted for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions with in Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continue to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the current status of lions within Zimbabwe and the level of management and oversight provided to them, the Service is able to find that the harvest and import of sport-hunted trophies of lions within Zimbabwe meet the purposes of the ESA. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe and the Service will reassess lion management within Zimbabwe and whether the importation of sport-hunted trophies enhance the survival of the species at the end of the 2018 hunting season or at which time substantive information becomes available to the Service in the interim.

Although the Service is able to make a finding that the management of lions within Zimbabwe meet the enhancement criteria under the ESA, there are certain documents and data the Service needs to evaluate in order to continue our current finding past the 2018 hunting season. The Service expects to be able to review data from the 2016, 2017, and 2018 hunting seasons to assess the lion populations and ensure that management efforts are enhancing the propagation and survival of the lion within Zimbabwe. Given that Zimbabwe's last management plan for lion was produced in 2006, the Service would like to see an updated plan established. Local management plans, such as the Management Plan for Hwange National Park will be sought. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will seek updates on further progress of the outputs or targets not yet accomplished. Lastly, the Service will also seek an update on the quota setting process. Specially, we will need further information on the establishment and implementation of precautionary quotas.

Therefore, with the information currently available to the Service, the Service is able to make a determination that the import of lions taken in Zimbabwe in 2016, 2017 and 2018 would meet the issuance criteria under 50 CFR 17.32. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application received for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized.

REFERENCES:

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2015a. Panthera leo. The IUCN Red List of Threatened Species: e.T15951A50658092.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L.T.B., Macdonald, D.W., and Packer, C. 2015b. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. PNAS doi: 10.1073/pnas.1500664112

Bijlsma, R., and Loeschcke, V. (2012), Genetic erosion impedes adaptive responses to stressful environments. Evolutionary Applications, 5: 117–129. doi:10.1111/j.1752-4571.2011.00214.xCAMPFIRE (2015). An Overview.

Björklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023/A:1024737317695

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-04.pdf

Craigie, I.D., Baillie, J.E.M., Balmford, A., Carbone, C., Collen, B., Green, R.E., and Hutton, J.M. 2010. Large mammal population declines in Africa's protected areas. Biological Conservation 143(9):2221–2228.

Creel, S., M'soka, J., Dröge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, O., and R. Mandisodza-Chikerema (2016). Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

EcoWeb (2015). Campfire Hunting Income and Distribution.

Elliot, N. B., Valeix, M., Macdonald, D. W. and Loveridge, A. J. (2014), Social relationships affect dispersal timing revealing a delayed infanticide in African lions. Oikos, 123: 1049–1056. doi:10.1111/oik.01266.

Fryxell, J.M., Mosser, A., Sinclair, A.R.E and Packer, C. 2007. Group formation stabilizes predator–prey dynamics. Nature 449, 1041-1043.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(1):219–229.

Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undermining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org/10.1371/journal.pone.0029332.

A. J. Loveridge, A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016). Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016). Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area – Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.com/environment/2016/jan/06/zimbabwe-plans-to-sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321–328. doi:10.1890/070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, B., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salerno, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.1111/ele.12091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142–153. doi:10.1111/j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. 2006. Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991). Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219–230. doi:10.1111/j.1523-1739.1991.tb00127.x

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, O., Hardy, O., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications of landscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion (*Panthera leo*) social organization in a human affected landscape. 2010.

Traill, L., Brook, B., Frankham, R., Bradshaw, C. (2010). Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 2010, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non-Detriment Findings for Panthera leo in Zimbabwe.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
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In Reply Refer To:
FWS/AIA/DMA/92335C

Enhancement Finding
Applicant: Michael Joseph McGinnis, Jr (PRT – 92335C)

Michael Joseph McGinnis, Jr submitted an application on May 22, 2018, for the importation of one male lion (*Panthera leo melanochaita*) taken from Mashonaland West, RiFa Safari Area, Hurungwe, Zimbabwe, for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken during May 20, 2017, from this population meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive,

carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P.l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinient to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P.l. melanochaita* taken in Zinmbabwe.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)] , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provides a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. McGinnis' application involving a *P. l. melanochaita* sport-hunted trophy taken in Zimbabwe, in the context of enhancement of propagation or survival in accordance

with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
>
> (b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and

other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. McGinnis' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zimbabwe's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider

include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32 (a)(2), we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter, in this case Mr. McGinnis' participation in the hunting program contributes to the overall management of lions within a country.

The management program in Zimbabwe for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA

regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-

funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in Du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species

can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (p.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and

international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being

implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in Du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is legally permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge *et al*. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five year terms, and how these concessionaires pay a 5 year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo*

in Zimbabwe ZPWMA 2016, only 16 are actively engaged in some form of wildlife based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015). As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 – 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters account for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport-hunters conduct lion hunts in these areas; if so, the Service is not aware if sport-hunters are exempted by the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at the RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine that this impact of a sport-hunted lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport hunting market in BVC and SVC from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to locals, which incentivizes them to conserve the African lion. As mentioned in the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. Du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted; ZPWMA (2016) reports the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of the SVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities

each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (Du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. U.S. hunter participation in lion hunts, in and of itself, is not enough to make or break the industry. However, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term impact.

Further, the *Strategy and Action Plan* have put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

Therefore, based on the information available to the Service and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Throughout the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based setting for hunting quotas. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector. Further, Zimbabwe appears to be transparent in their management processes, including their quota setting.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (Du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both the BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (Du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continues to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion will likely reduced the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of this trophy, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the status of lions within Zimbabwe at the time Mr. McGinnis' conducted his hunt, and the level of management and oversight provided to lions at that time, the Service is able to find that the harvest and import of Mr. McGinnis' sport-hunted trophy taken in Zimbabwe on May 20, 2017, meets the purposes of the Act. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe. Although the Service is able to make a finding that the import of this lion meets the enhancement criteria under the Act, the Service will continue to monitor the status and management of the lion in Zimbabwe. Noting that Zimbabwe's last management plan for lion was in 2006, the Service would like to see a current and updated plan that has been established as the national plan and disseminated across the country. The *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (2016), mentions a Management Plan for Hwange National Park; a copy of that and any other developed management plans will be considered in the future. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will need to be continually updated on further progress of the outputs or targets. Lastly, the Service will also need to review any updates to the quota setting process.

Therefore, with the information available to the Service at the time Mr. House conducted his hunt, and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male lion trophy taken in Zimbabwe, to Mr. Michael Joseph McGinnis, Jr. of Lyndhurst, Virginia.**

6/8/18

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Branch of Permits
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6/8/2018

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REFERENCES:

References

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2015a. Panthera leo. The IUCN Red List of Threatened Species: e.T15951A50658092.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L.T.B., Macdonald, D.W., and Packer, C. 2015b. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. PNAS doi: 10.1073/pnas.1500664112

Bijlsma, R., and Loeschcke, V. (2012), Genetic erosion impedes adaptive responses to stressful environments. Evolutionary Applications, 5: 117–129. doi:10.1111/j.1752-4571.2011.00214.xCAMPFIRE (2015). An Overview.

Björklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023/A:1024737317695

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-04.pdf

Craigie, I.D., Baillie, J.E.M., Balmford, A., Carbone, C., Collen, B., Green, R.E., and Hutton, J.M. 2010. Large mammal population declines in Africa's protected areas. Biological Conservation 143(9):2221–2228.

Creel, S., M'soka, J., Dröge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, O., and R. Mandisodza-Chikerema (2016). Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

EcoWeb (2015). Campfire Hunting Income and Distribution.

Elliot, N. B., Valeix, M., Macdonald, D. W. and Loveridge, A. J. (2014), Social relationships affect dispersal timing revealing a delayed infanticide in African lions. Oikos, 123: 1049–1056. doi:10.1111/oik.01266.

Fryxell, J.M., Mosser, A., Sinclair, A.R.E and Packer, C. 2007. Group formation stabilizes predator–prey dynamics. Nature 449, 1041-1043.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(1):219–229.

Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undermining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org/10.1371/journal.pone.0029332.

A. J. Loveridge, A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016). Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016). Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area – Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.com/environment/2016/jan/06/zimbabwe-plans-to-sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321–328. doi:10.1890/070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., Delongh, H.H., Joubert, D., Kissui, B., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salerno, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.1111/ele.12091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142–153. doi:10.1111/j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. 2006. Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991). Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219–230. doi:10.1111/j.1523-1739.1991.tb00127.x

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, O., Hardy, O., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications of landscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion (*Panthera leo*) social organization in a human affected landscape. 2010.

Traill, L., Brook, B., Frankham, R., Bradshaw, C. (2010). Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 2010, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non-Detriment Findings for Panthera leo in Zimbabwe.

LION ZIMBABWE ESA TROPHY

Permit Number: MA92335C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coghlan
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

MICHAEL JOSEPH MCGINNIS JR.
(b) (6) [redacted]
LYNDHURST, VA 22952
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RCVD JUN 01 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name		1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Abbott		Marsha	Ann	
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address	
(b) (6)				

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
McGehee	Arkansas	71654	~~Des~~ Desha	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
(b) (6)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
McGehee	Arkansas	71654	Desha	USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) — 05/18/2018

mit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo melanochaita, African lion

   b. Sex (if known). male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   Zambia, Chanjuzi GMA, Eastern Province.
   nearest city is Lusaka, nearest town is Lundazi

   b. Date wildlife is to be hunted: June 3-July 4, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Muchinga Outfitters, Impanga Safaris Ltd. Lusaka, Zambia

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name:
   Business Name: Impanga Safaris
   Address: P.O. Box 31012
   City: Lusaka
   State/Province:
   Country, Postal Code: Zambia

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

    Applicant's signatur(b)(6) _____ Date: 5/18/18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-93468C

Enhancement Finding
Applicant: Marsha Ann Abbott (PRT-93468C)

Marsha Ann Abbott submitted an application on June 1, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 3, 2018, or July 4, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Ms. Abbott's application involving a *P. l. melanochaita* sport-hunted trophy taken in Chanjuz GMA, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Ms. Abbott's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Ms. Abbott's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Ms. Abbott's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Ms. Abbott's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Ms. Abbott will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Ms. Abbott in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Ms. Abbot.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to her to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Marsha (b) (6) Abbot.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA93468C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

MARSHA ANN ABBOTT
(b) (6) [redacted]
MCGEHEE, AR 71654
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

OCT 05 2018

No lion was obtained.
Do not use this permit

LION ZAMBIA ESA TROPHY

Permit Number: MA93468C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
MARSHA ANN ABBOTT
(b)(6) [redacted]
MCGEHEE, AR 71654
U.S.A.

Original, Unused
Permit Returned

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

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G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African Lion *(Panthera Leo Melanochiata)* trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signe[redacted]

Name: Richard Papapietro Jr.

Date: 5/15/19

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD JUN 01 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Papapietro	Richard	Antony	Jr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business/agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business/agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Henderson NV	89012	Clark USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
Same

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 05/15/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo melanochaita (African lion)

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Zambia - Sichifulo GMA. Nearest Town: Mulobezi. Latitude: 16.82944 Longitude: 25.49640

b. Date wildlife is to be hunted:

July 25 - August 11, 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Mulimo Safaris, Sichifulo GMA. Professional Hunter Greg Street

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Michael Borman
Business Name:	Bangweulu Taxidermy, Ltd.
Address:	4142/Chifwema Road
City:	New Kasama
State/Province:	Lusaka, Zambia.
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see attached.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Please see attached.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

Please see attached.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import tw

Applicant's sign (b) (6) ate: 5/15/19

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/3/18

Operator Enhancement Questionnaire

1. Name of area operator: MULIMO SAFARIS
   a. Years in business: 5
   b. Name of company conducting hunt: MULIMO SAFARIS
2. Name of concession: SICHIFULO GMA Size in km²: 3600
   a. Land tenure: __ Government lease X Community __ Private ranch __ Private conservancy
   b. Length of concession agreement: 10 YEARS Can it be renewed? X Yes ~~No~~
   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: YES. ANTI POACHING, COMMUNITY OBLIGATIONS, EMPLOYMENT
   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   e. If the concession borders a national park, please provide the park name: KAFUE NATIONAL PARK.
   f. Description of general and distinctive habitat features and any water features: MIOMBO WOODLAND AND PLAIN.
3. Are there any communities living in the concession? ✓ Yes __ No
   a. If so, estimated number of people or villages in the concession? 1000
4. Are there communities bordering this concession? ✓ Yes __ No
   a. If so, estimated number of people or villages around the concession? 5000
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	AVG		UP	SIGHTINGS
Lion	AVG		UP	SIGHTINGS
Leopard	DENSE		UP	SIGHTINGS
Prey species	AVG		UP	SIGHTINGS

6. Total employment number: 30
   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	1	1

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Trackers	2	2
Anti-poaching scouts/rangers	18	18
Other anti-poaching		
Cooks/housekeepers	1	1
Community coordinators	2	2
Managers		
Biologists		
Others: GENERAL STAFF	14	14

7. Number of staff employed in the off-season: 15

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	10	10	ALL YEAR.
Managers			
Maintenance	5	5	ALL YEAR
Road opening/construction			
Community relations personnel			
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: +-20

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? BOTH

   c. Months during which anti-poaching patrols are conducted: ALL

   d. Number of anti-poaching patrols per month: 2 or 3

   e. Description of anti-poaching equipment, vehicles, etc.: RADIO EQUIPMENT / MOTORBIKES.

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? OPERATOR AND GOVERNMENT

   g. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? _____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts		20 000 $	23000 $	
Equipment		15 000 $	10000 $	
Vehicles		10 000 $	15 000 $	
Petrol		3000 $	4000 $	

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Conservation Force
Operator Enhancement Questionnaire

Rewards paid		1000$	500$	
Other: _____				
Other: Hunting			5000$	
TOTALS		48000$	55500$	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		20	15	
Ivory poachers arrested			4	
Meat poachers arrested		10	5	
Other poachers arrested		-	-	
Poachers convicted		5	2	
Snares/gin traps collected		300	100	
Firearms confiscated		4	4	
Vehicles confiscated		-	-	
Bicycles confiscated			4	
Boats/nets confiscated		3		
Tusks recovered		-	-	
Carcasses observed		4	3	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? ✓ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? By contract and voluntary.

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 50%

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NO

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? N/A

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)		$1000	$2000	
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)		$2000		
Community scout salaries		$8500	$8500	
Other community anti-poaching				
Local government activities				
Water infrastructure improvements		$3000		
Sports teams funded				
Construction materials donated			$6000	
Other: Law Enforcement		$2000	$2000	
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)			
-- hunting lion		N/A	80%
-- hunting elephant			
-- hunting leopard		ALL 100%	50%

12. Dollar amount and percentage of the company's revenue from U.S. clients: 80%

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the for[redacted]rect.

Signature: _____

Name: JIMMY DUNCAN Title: MANAGER

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-93474C

Enhancement Finding
Applicant: Richard Anthony Papapietro Jr. (PRT- 93474C)

Richard Anthony Papapietro Jr. submitted an application on June 1, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken from July 25, 2018, through August 11, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively,

except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import

of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Papapietro's application involving a *P. l. melanochaita* sport-hunted trophy taken in Sichifulo GMA, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Papapietro's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Papapietro's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Papapietro's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Papapietro's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports

regulatory pathways in support of positive conservation outcomes. Zambia's lion management program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Papapietro will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Papapietro, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Papapietro.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Richard Anthony Papapietro.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA93474C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

RICHARD ANTHONY PAPAPIETRO JR.
(b) (6)
HENDERSON, NV 89012
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Elder	Chris	L	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Springdale	AR	72764	Washington	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S

(b)(6) [redacted]

5-29-18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   P.I. melanochaita (African Lion)

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   S. Luangwa, Zambia in Nyamvu, Nyimba closest town, operator Nyamvu & Mopane Saf

   b. Date wildlife is to be hunted: 7/27/2018-8/17/2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Ivory Safaris, Jeff Rann

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Michael Borrman
Business Name: Bangweulu Taxidermy
Address: 41421 Chifwema Rd, New Kasama
City:
State/Province: Lusaka Southern Zambia
Country, Postal Code: 50100

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: _____

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-93561C

Enhancement Finding
Applicant: Chris L. Elder (PRT-93561C)

Chris L. Elder submitted an application on June 1, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken from July 27, 2018, through August 17, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the

prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Elder's application involving a *P. l. melanochaita* sport-hunted trophy taken in South Luangwa, Nyamvu, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Elder's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Elder's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Elder's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Elder's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Elder will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Elder, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Elder.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Chris L. Elder.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/18/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA93561C-0
Effective 06/08/2018 Expires 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coogliano
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHRIS L. ELDER
(b) (6)
SPRINGDALE, AR 72764
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r)

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*) taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
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CHRISSIE JACKSON
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SHANE MAHONEY
RENEE SNIDER

January 28, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD FEB 8 2019

RE: Chris Elder's Notice of Representation, 93561C, Zambian Lion Import

Dear Chief Cogliano:

Enclosed is the original Notice of Representation allowing for Conservation Force to represent Chris Elder's Lion Permit application. The PRT for Mr. Elder's permit application is 93561C. This applicant has already taken his lion and filed his application more than a year ago. Can you please advise the status of his import application

Sincerely,

John J. Jackson III

encl:

- Chris Elder's Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Chris Elder

Date: 1-22-19

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

October 17, 2019

TRANSMISSION VIA EMAIL: darcy_vargas@fws.gov
Department of the Interior
U.S. Fish and Wildlife Service
Ms. Darcy Vargas, Biologist
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RCVD OCT 30 2019

RE: RENEWAL APPLICATION TO IMPORT A SPORT-HUNTED TROPHY
PRT #: MA93561C-0
APPLICANT NAME: CHRIS L. ELDER

Dear Ms. Vargas:

Attached please find Renewal Application [Form 3-200-52], and check in the amount of $100.00, FWS Permit Number: MA93561C-0, effective 06.08.2018, expires: 06.07.2019, for an Import Permit of a Sport-Hunted Trophy for the above captioned applicant.

Below please find details about the harvest:

SPECIE: Panthera Leo [African Lion]
COUNTRY: Zambia
DATE OF HARVEST: August 10, 2018

If you have any questions, please do not hesitate to contact us.

Sincerely,

/s/ John J. Jackson
John J. Jackson

JJJ/ecs
cc: File
Applicant: Chris L. Elder, via email: *chriselder62@gmail.com*

Enclosures:
- Application for Renewal
- Check $100.00
- FWS Permit Number: MA93561C-0

Form 3-200-52

OMB Control No. 1018-0093
Exp. 08/31/2020

RCVD OCT 30 2019 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Elder	Chris	L.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b)(6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Springdale	AR	72764	Washington	U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 09/27/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John Jackson, CONSERVATION FORCE, 504.837.1233; e: CF@conservationforce.org

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA93561C-0

5. Submit the original permit with this application.

6. **Past activities.** See Attached

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

      Permittee's signature: (b)(6) Date: 09/27/2019

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

RE: RENEWAL APPLICATION FOR IMPORT OF A SPORT-HUNTED TROPHY

PRT #:	MA93561C-0
APPLICANT NAME:	Chris L. Elder
COUNTRY:	Zambia
SPECIE:	Panthera Leo [African Lion]

Please see answers below to question **6, Past Activities:**

a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.

N.A.

b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

Permit expired before it could be used.

Permit Number: MA93561C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coogliano
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
CHRIS L. ELDER
(b)(6)
SPRINGDALE, AR 72764
U.S.A.

Original, Unused Permit Returned

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one maleAfrican lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Vargas, Darcy <darcy_vargas@fws.gov>

United States Lion Trophy Import / Chris L. Elder

Terry Njovu <Terry.Njovu@mota.gov.zm> Mon, Sep 30, 2019 at 6:55 AM
To: "darcy_vargas@fws.gov" <darcy_vargas@fws.gov>
Cc: "Eldred A. Chomba" <Eldred.Chomba@mota.gov.zm>, Shabwela Shantanda <Shabwela.Shantanda@mota.gov.zm>, Info DNPW <Info.DNPW@mota.gov.zm>

Dear Colleagues

Mr. Elders Christopher Lynn hunted one Lion trophy on Hunting permit number 0001152. The hunt was conducted in Musalangu GMA in the Eastern part of Zambia.

The Lion was harvested on 10th August 2018.

Therefore, we do confirm that 1 Lion was legally hunted by the client in the 2018.

Kindly facilitate the import.

Best regards

Terry

Terry Basabeka Njovu
Senior Ranger
CITES Management Unit
Ministry of Tourism and Arts
Department of National Parks and Wildlife
P/Bag 1
Chilanga
Zambia

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Tuesday, September 17, 2019 3:47 PM
To: Eldred A. Chomba; Info DNPW
Subject: United States Lion Trophy Import / Chris L. Elder

[Quoted text hidden]

Elder Christopher Lynn Source Documents.pdf
2137K

Vargas, Darcy <darcy_vargas@fws.gov>

United States Lion Trophy Import / Chris L. Elder

Vargas, Darcy <darcy_vargas@fws.gov> Mon, Oct 21, 2019 at 4:07 PM
To: Terry Njovu <Terry.Njovu@mota.gov.zm>

Dear Terry,

Thank you very much for your reply.

As we already issued Mr. Elder a CITES import permit for 1 lion trophy taken in 2018, we do not intend to approve his second request for another lion trophy, also taken in 2018.

[Quoted text hidden]

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] UNITED STATES LION TROPHY IMPORT FOR CHRIS LYNN ELDER

Miyanda Gwaba (b) (6) > Fri, Nov 8, 2019 at 6:04 AM
To: darcy_vargas@fws.gov
Cc: Andrew Eldred <rhinorangerzawa@yahoo.co.uk>, Eldred.Chomba@mota.gov.zm, info.DNPW@mota.gov.zm, Richard Mwamba (b) (6), Mwamba Richard (b) (6), James Chisulo <jaykuzi@yahoo.co.uk>, (b) (6), (b) (6), miyanda.hijuwa@mota.gov.zm

Dear Darcy,

Reference is made to the above captioned subject matter.

Firstly I would like to apologize for sending you this information late and I hope it the information provided will be very useful.

Kindly find attached a letter providing the necessary feedback that you requested. Should you have any queries please do not hesitate to contact me at your earliest convenience.

Kind regards,

Miyanda Gwaba

Senior Licensing Officer
Commercial Services
Department of National Parks and Wildlife
Ministry of Tourism and Arts

US FISH AND WILDLIFE SERVICE.pdf
257K

Tel: +260 211 253950
Fax: +260 211 253930
Telex: ZA 45510
Email: pamta@mota.gov.zm

REPUBLIC OF ZAMBIA

MINISTRY OF TOURISM AND ARTS

OFFICE OF THE PERMANENT SECRETARY

KWACHA HOUSE
CAIRO ROAD
P.O. Box 30575
10101 LUSAKA

NPW/8/1/1

Friday 8th November, 2019.

Mr. Darcy Vargas,
Biologist,
US Fish and Wildlife Service,
MS: IA 5275 Leesburg Pike,
Falls Church, VA 22041-3803
UNITED STATES OF AMERICA

REF: UNITED STATES LION TROPHY IMPORT – CHRIS LYNN ELDER

Reference is made to the above captioned subject matter.

We wish to acknowledge receipt of your letter dated 17th September, 2019, wherein you requested the Department to confirm if Mr. Chris Lynn Elder was authorized to hunt one (01) or two (02) Lions during Zambia's 2018 Lion hunting season.

The Ministry of Tourism and Arts, Department of National Parks and Wildlife (DNPW) would like to confirm to you that Mr. Chris Lynn Elder hunted one (01) Lion and one (01) Leopard on 10th August, 2018 under Ivory Safaris Limited in the Chikwa Game Management Area (GMA) on the following Game Management Area Permit Numbers 1151 and 1152 and Hunting License Numbers Lion 0000732 and Leopard 0000731.

The Department is not aware of any detrimental issues regarding Mr. Chris Lynn Elders possession of the wildlife trophies as all the necessary legal procedures were followed. The Department wishes to thank you most sincerely in anticipation of your usual corporation.

For any queries or clarifications, please do not hesitate to contact the undersigned or directly on the following contact details: info.DNPW@mota.gov.zm or Telephone No. +260 211 278 524.

Yours Faithfully,

Paul Zyambo
DIRECTOR-DEPARTMENT OF NATIONAL PARKS AND WILDLIFE

FOR/PERMANENT SECRETARY MINISTRY OF TOURISM AND ARTS

CC: Permanent Secretary- Ministry of Tourism and Arts - LUSAKA
Assistant Director Commercial Services - DNPW - CHILANGA
Assistant Director - Conservation and Management, DNPW - CHILANGA
Assistant Director – Research and Veterinary Services, DNPW - CHILANGA

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Amy Brisendine Date: April 7, 2020

Telephone Number: 703-358-2005

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 93561c, Chris L. Elder, has requested a permit to import a trophy of one lion that he lawfully hunted in Zambia. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zambia on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zambia.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zambia. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

MARY COGLIANO

Digitally signed by MARY COGLIANO
Date: 2020.05.04 14:41:56 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

Permit Number: MA93561C-1
Effective: 05/04/2020 Expires: 05/03/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.05.04 17:49:24 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:
CHRIS L. ELDER
(b)(6) [redacted]

U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

RCVD JUN 06 2018

48

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kirsch	PatricK	L	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite # or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Waconia	MN	55387	Carver	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6)

05/21/2018

continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Patrick Kirsch
   (b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   LioN , [redacted]

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Tanzania, East Africa. Hunting Block: M'barangandu Wildlife Managed Area

   b. Date wildlife is to be hunted:

   August 28, 2018 thru September 17, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Game Frontiers of Tanzania
   Plot 23, Kasanga Street
   Dar es Salaam, Tanzania

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   Not hunted yet

   b. Date wildlife was hunted:

   Not hunted yet

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Not hunted yet

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Not hunted yet

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Have Not hunted yet

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Game Frontiers of Tanzania
Address: Plot 23, Kasanga Street
City:
State/Province: Dar es Salaam, Tanzania
Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
The professional hunter through whom I am hunting has hunted this area eve year for the past 8 years and reports seeing a number of male lions above th age of 6 years. He credits this to the thoughtful and successful game managem practices introduced in 2012. The benefits of which we see today.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
It is my understanding the govt. is paid $30,000.00 each year by Game Fronti for access to the hunting block with an additional $ 30,000 paid each year to local game department who manages and controls the hunting. In addition, the hunting company employs workers from the village (cont on an she

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

The hunting company each and every year improves the hunting a by grading roads, select and careful burning, construction of watering points, maintenance and expansion of springs, anti-poaching patrols and radio communication with government personnel and by conducting game surveys. It is essential to the (continued

Question 9B. Continued

and makes significant purchases of goods and services. The benefit to the local economy is substantial. Lastly, the hunting company gives the community much needed protein in the form of meat from trophies shot and paid for by the client.

Question 9C. Continued

Success of the hunting business that sound game management practices are followed at all times.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

NA → Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: _____ Date: 5/21/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import application / request for information

1 message

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:14 PM
To: (b)(6)

Mr. Kirsch,

We are in the process of reviewing applications for the import of African lions taken from Tanzania.

The U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. We are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings that were developed in the past. As such, we would like to give you the opportunity to submit additional information in support of your application. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import application / request for information

2 messages

But Tue, Jul 24, 2018 at 4:14 PM
To: (b)(6)

Mr. Kirsch,

We are in the process of reviewing applications for the import of African lions taken from Tanzania.

The U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. We are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings that were developed in the past. As such, we would like to give you the opportunity to submit additional information in support of your application. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Patrick Kirsch <patrick@summersetproducts.com> Tue, Jul 31, 2018 at 11:30 AM
To: "Butzler, Julia" <julia_butzler@fws.gov>
Cc: Patrick Kirsch <patrick@summersetproducts.com>

Julia,

You can disregard and discard this application. There has been a change to my plans

And I am not hunting in Tanzania now.

Sincerely,

Patrick Kirsch

From: Butzler, Julia <julia_butzler@fws.gov>
Sent: Tuesday, July 24, 2018 3:14 PM
To: Patrick Kirsch (b)(6)
Subject: Tanzania lion / import application / request for information

[Quoted text hidden]

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed (b) (6)

Name: Gary H. Shores

Date: May 3, 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

RCVD JUN 14 2018 LB

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a Last Name	1.b First Name	1.c Middle Name/Initial	1.d. Suffix
Shores	Gary	H	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Wichita Falls	Texas	76302	Wichita	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

05/03/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo Melanochaita Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Zimbabwe, Dande North Hunting Area

   b. Date wildlife is to be hunted:

   09/13/2018 - 09/3/2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Charlton McCallum Safaris - Keith Wall, ph

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Please see attached -
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see info previously provided by EPWMA + Conservation Force

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Same

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

Same

Gary Shores

From: CMS <admin1@cmsafaris.com>
Sent: Friday, May 04, 2018 7:25 AM
To: (b) (6)
Cc: Keith Wall
Subject: Re: September Lion Hunt

Hi Gary,

Thank you for your emails. You may use the following for your permit

~~Name: Gary Shores~~
Company name: Opping Investments t/a Charlton McCallum Safaris
Address: 14 Yellow Wood Lane
Kambanji
Harare
Zimbabwe
Postal code: 0000

For # 8

Let me know if there will be anything else you may require, happy to help.

Have a lovely weekend
Kirsty

From: CM Safaris
Sent: Friday, May 4, 2018 10:12 AM
To: CMS
Subject: Fw: September Lion Hunt

From: Gary Shores (b) (6)
Sent: Thursday, May 3, 2018 4:33 PM
To: CM Safaris
Subject: September Lion Hunt

Dear Sir,
If we are successful in getting a lion during our September hunt with you at Dande I will need the name of the person o business shipping the trophy to me. The Federal Fish and Wildlife Permit Application asks for the following information:

Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

The trophy/trophies will be shipped to The Wildlife Gallery, Inc.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

    Applicant's signature: (b)(6) _____ Date: 05/03/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

DAPU End of year Newsletter 2017

Charlton McCallum Safaris

10 January 2018

DAPU

DANDE ANTI POACHING UNIT

visit us at www.dapuzim.com

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Dear Friends,

Thank you all so much for your unwavering support. DAPU has continued to build and evolve consistently throughout 2017. Total recorded snare yields, elephant poaching and illegal netting for the year 2017 are the lowest since the inception of DAPU. To be precise, since 2014 snaring has been reduced by 70% and poached elephants by 66%. We have recorded poached elephants since 2010, and whilst our 2010 and 2011 numbers are not perfectly accurate .... Elephant poaching has been reduced by 92% or from a high of 40 lost in 2010 and a low of 3 lost in 2017.

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Harare, Zimbabwe
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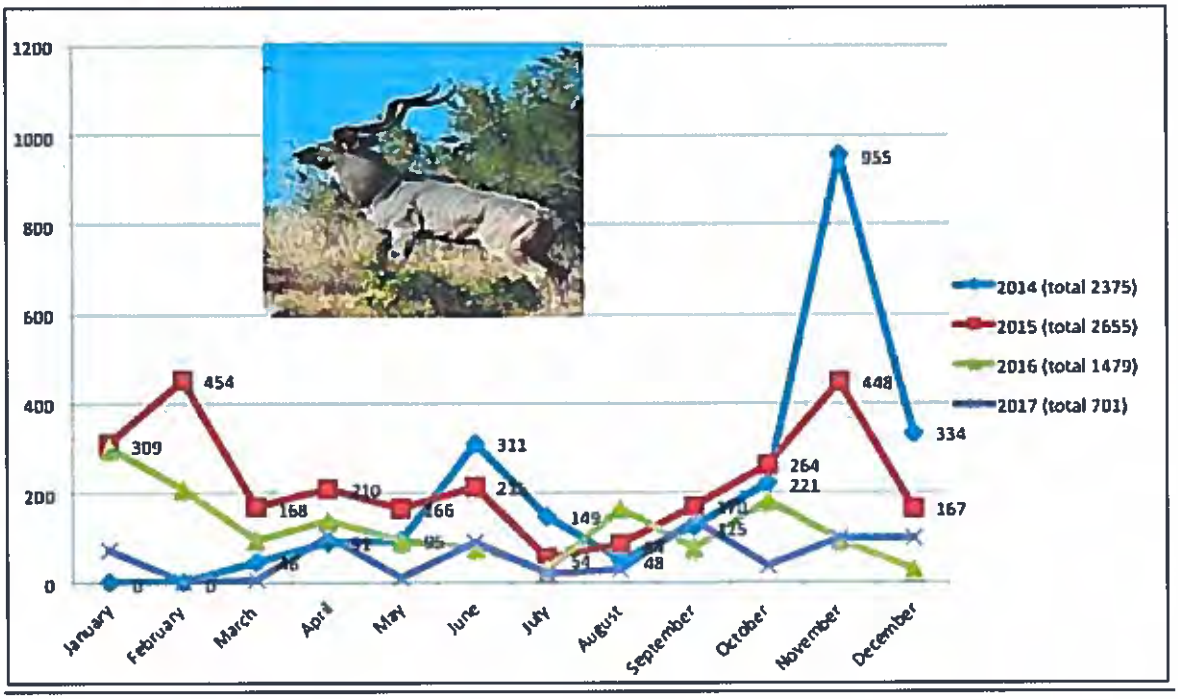

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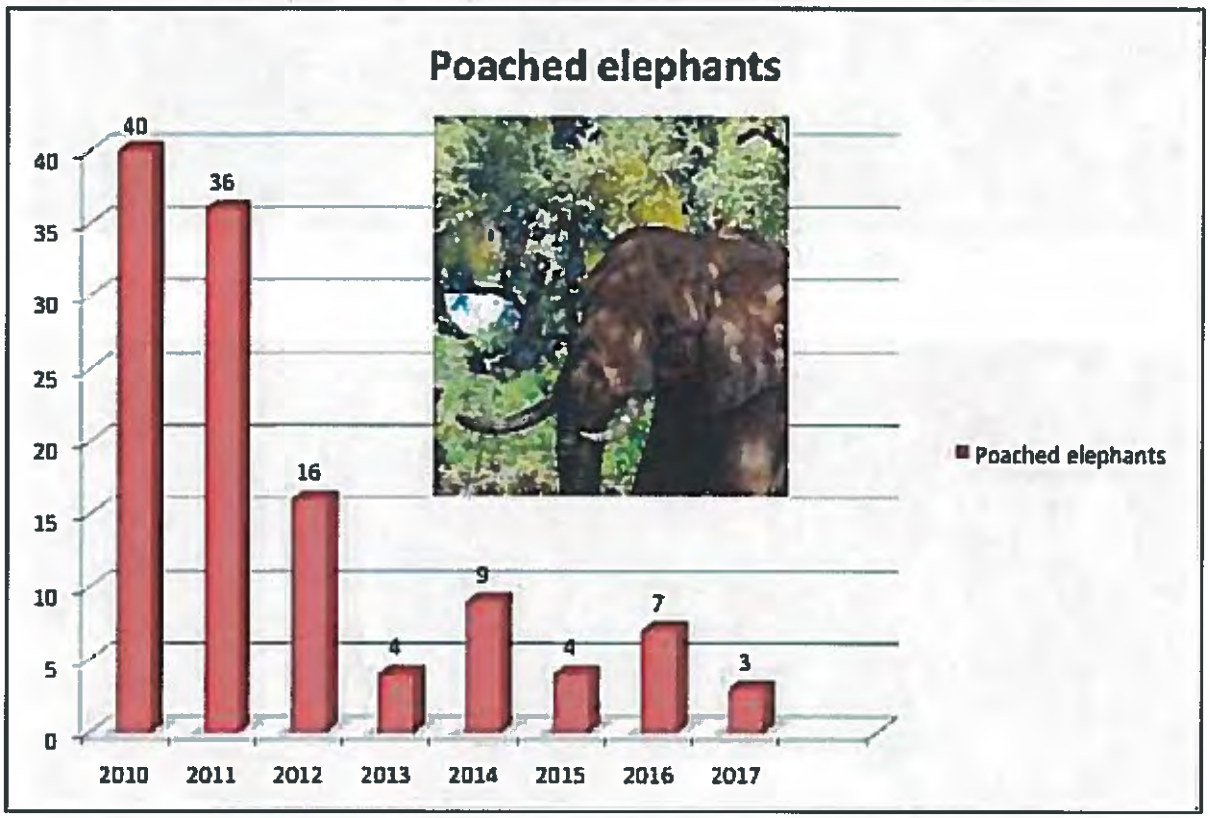

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None shot in 2017 BUT there have been and will always be sporadic raids by (mostly) young bulls into riverside vegetable gardens and fields. We treat every report as serious and the DAPU teams really react as strongly as they can early on. This normally saves us shooting. Our DAPU crews go onto full time elephant PAC rosters from February through to the end of April.

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One old lioness killed and ate an old man from Kanyemba. He was on his way to the Zambezi to go fishing for his family. The very unfortunate scene was attended to by DAPU and she was shot, close to where she killed. Sporadic killing of livestock persists especially in ward 4 (8 cattle killed in November / December - but no lions shot in that area.

*** Skin and bones***

*** This picture clearly shows the tooth wear –she is an old cat***

7.1.3 Buffalo

Only the one blind old buffalo cow in Pedza villages was destroyed. Buffalo spend allot of time in the villagers gardens at night – normally the villages chase them or fence of gardens as required. In the rainy season they love to eat corn and cotton, which is grown in bigger fields, so that is more problematic as they cannot be fenced.

7.1.4 Crocodile

No one killed or injured that we know of.

7.1.5 Hippo

Hippos continue to generally make a nuisance of themselves along the Mwantanda River in ward 1 and in ward 16 (where the Manyame comes into the Zambezi Valley). Two badly behaved hippo were shot in March by Council but that was all.

7.1.6 Snake bites

Nothing to report.

8. Netting on the Zambezi

DAPU will continue to contribute 200 liters of petrol per month toward efforts to eliminate all illegal fishing in a 50km stretch of the Zambezi River. In 2017 National Parks achieved the following:

8	**Banana boats.**
10	Makoros.
14,340m	Nets burnt.
6	Basket traps.
33	Arrests.
19	Escaped.

Only when we added up the season's haul of nets, boats and poachers did we realize:

1. The scale of the problem.
2. How much work the National Parks crews have done.

We estimate that 85% of all illegal Netting has been stopped. Fisherman reported much improved catches as a whole, with lots of small tiger and bream caught – this can only bode well for all parties in the future.

Obviously lots of illegal fisherman also lay snares and much worse, so this effort is well worth supporting. Please see attached a separate report from National Parks.

***Measuring nets – note the fine gauge ***

Fish traps – Zambezi River 2017

(Funnily enough large gauge holes & eco friendly - just placed in wrong country!

9. Goals for 2017

1	Continue with anti-poaching patrols	Patrols have done well - we have had the quietest year in our history.
2	Early burning will start in May as soon as it is dry enough.	Complete – our most intensive effort in 8 years and surely best in 20 years.
3	Repair firearms where possible or replace	Delivered!!!
4	New boots (on the way).	Stuck in Durban.
5	New uniforms – paid for not delivered.	Delivered.
6	If possible trade in one of the older DAPU vehicles for a newer one.	DSC-F has funded DAPU to the tune of 24,000 dollars towards a new pick up. Delivery expected end of January 2018.
7.	Install New solar pump in East by end of September	Done and pumping!

Aimguard shotguns x 6 per kind favor of a young Harare based hunter

*** 3200m of piping and solar pump installation Dande East, October 2018***

10. Conservation Force

We continue to work hand in hand with John and Chrissie Jackson of Conservation Force. John and Chrissie are proud hunters and legends in the fight for our way of life and the wild places that we all love.

Conservation Force is a registered non – profit 501(c)(3) public foundation.

How to make a Tax Deductible donation.

Please make a check out to:
Conservation Force

Mail to:
C/O John J. Jackson,III
3240 S. 1-10 SERVICE ROAD W.
SUITE 200, METAIRIE,
LOUISIANA 70001
USA

Check Ref: DAPU

Conservation Force Contact:
JOHN J. JACKSON,III
TEL:(504) 837 - 1233
FAX:(504) 837 – 1145
Email: Jjw-no@att.net
Website: www.conservationforce.org

11. Flying for wildlife and others.

We must extend our thanks to:

1. Flying for Wildlife for their aerial patrols that are conducted on request. These are volunteer pilots in their own machines and they help us at NO cost to DAPU, which is tremendous.

3. Pieter Gertenbach and Charl Grobelar – farmers in the Harare area that are always helping out with mealie meal, fertilizers, soap and other ration items. We use this to supplement the DAPU rations and it is always very well received by the DAPU teams!

4. Trackit (Richard Tennant and Hannes Scholtz) who provide free, real time satellite monitoring of the two DAPU vehicles. This has really saved significantly on fuel and vehicle costs. Also of course we have been able to be much smarter with servicing, and positioning of vehicles.

12. DAPU Income and Expenses 2017

Income	
Bob Schofield	US$100
Burton Foundation	US$2,000
Communites Foundation of Oklahoma	US$2,000
David Adams	US$5,000
David Maple	US$500
DSCF.	US$24,000
Jeff Butterfield	US$250
Jeff Haulbrook	US$2,680
Jerry Beardmore	US$500
Jerry Jurena	US$600
Johnathan Frist	US$4,000
Jytte Merjtsensen	US$2,750
Martinus van der Linden	US$200
Mike Core	US$1,000
Morning Charitable Trust	US$500
Myron Repka	US$2,880
Sylvarnus Charitable Trust	US$6,000
	US$54,960
2017 Hunting clients levies and contributions.	***US$13,116***
Charlton McCallum Safaris	***US$45,540***
Total Income	***US$113,616***

Expenses

 # 1 Wages, rewards and rations.

	Game Scouts	Management Bongi, Muno Alfa & Owen.	Rations	Rewards	Fish poaching (ZAPP)	Total
January	US$1,100	US$1,605	US$770	US$784	US$250	US$4,509
February	US$1,100	US$1,605	US$770	US$150	US$250	US$3,875
March	US$1,100	US$1,605	US$770	US$19	US$250	US$3,744
April	US$1,100	US$1,605	US$770	US$133	US$250	US$3,858
May	US$1,100	US$1,605	US$910	US$9	US$250	US$3,874
June	US$1,100	US$1,605	US$910	US$118	US$250	US$3,983
July	US$1,100	US$1,605	US$910	US$439	US$250	US$4,304
August	US$1,100	US$1,605	US$910	US$48	US$250	US$3,913
September	US$1,100	US$1,605	US$910	US$1,327	US$250	US$5,192
October	US$1,100	US$1,605	US$910	US$68	US$250	US$3,933
November	US$1,100	US$1,605	US$910	US$1,574	US$250	US$5,439
December	US$1,100	US$1,605	US$910	US$34	US$250	US$3,899
Christmas	US$1,100	US$1,605	US$0	US$0	US$0	US$2,705
	US$14,300	***US$20,865***	***US$10,360***	***US$4,703***	***US$3,000***	***US$53,228***

 # 2 2017 DAPU equipment expenses

Grease Junkey repairs to AAX9832	US$5,000
Burj Auto spares for ABX 7074	US$1,267
MM Auto supplies spares and labour for ABX 7074	US$2,574
LG Harrisons Aimguard shotguns x 6	US$3,450
Uniforms	US$2,684.00
Toyota Hilux	US$27,150.00
	US$42,125.00

 # 3 Vehicles (2).

AAX 9832 = 17050 km x $0.5 x km	US$8,525
ABX 7074 = 19476 km x $0.5 x km	US$9,738
Total	***US$18,263***

Total expenses		***US$113,616***
Total Income	***US$113,616***	
Shortfall / Credit		***US$0***

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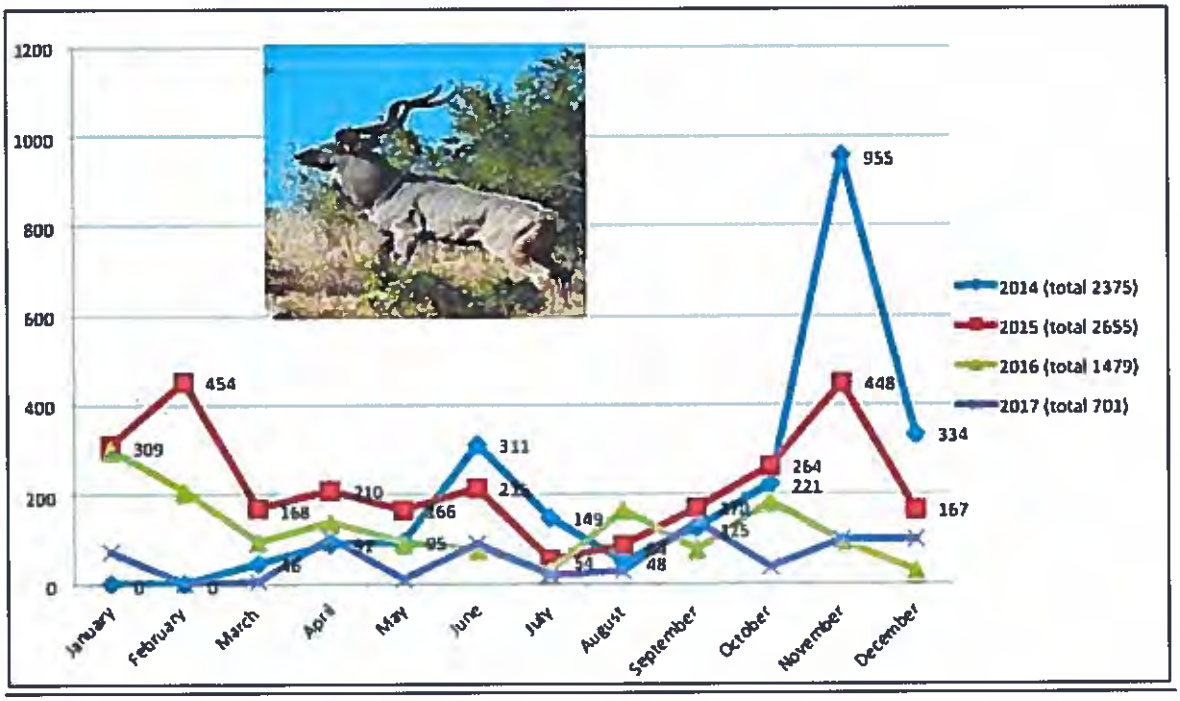

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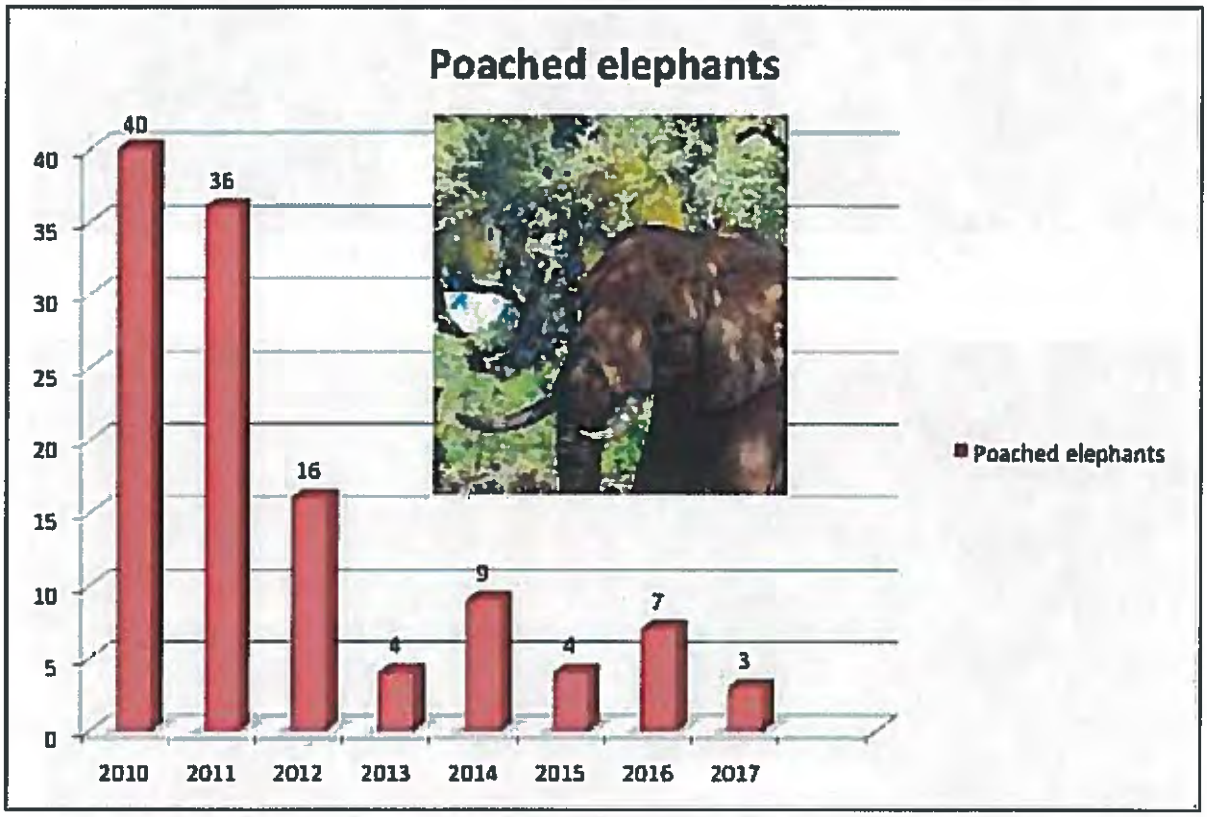

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No one killed or injured that we know of.

7.1.5 Hippo

Hippos continue to generally make a nuisance of themselves along the Mwantanda River in ward 1 and in ward 16 (where the Manyame comes into the Zambezi Valley). Two badly behaved hippo were shot in March by Council but that was all.

7.1.6 Snake bites

Nothing to report.

8. Netting on the Zambezi

DAPU will continue to contribute 200 liters of petrol per month toward efforts to eliminate all illegal fishing in a 50km stretch of the Zambezi River. In 2017 National Parks achieved the following:

8	**Banana boats.**
10	Makoros.
14,340m	Nets burnt.
6	Basket traps.
33	Arrests.
19	Escaped.

Only when we added up the season's haul of nets, boats and poachers did we realize:

1. The scale of the problem.
2. How much work the National Parks crews have done.

We estimate that 85% of all illegal Netting has been stopped. Fisherman reported much improved catches as a whole, with lots of small tiger and bream caught – this can only bode well for all parties in the future.

Obviously lots of illegal fisherman also lay snares and much worse, so this effort is well worth supporting. Please see attached a separate report from National Parks.

***Measuring nets – note the fine gauge ***

Fish traps – Zambezi River 2017

(Funnily enough large gauge holes & eco friendly - just placed in wrong country!

9. Goals for 2017

1	Continue with anti-poaching patrols	Patrols have done well - we have had the quietest year in our history.
2	Early burning will start in May as soon as it is dry enough.	Complete – our most intensive effort in 8 years and surely best in 20 years.
3	Repair firearms where possible or replace	Delivered!!!
4	New boots (on the way).	Stuck in Durban.
5	New uniforms – paid for not delivered.	Delivered.
6	If possible trade in one of the older DAPU vehicles for a newer one.	DSC-F has funded DAPU to the tune of 24,000 dollars towards a new pick up. Delivery expected end of January 2018.
7.	Install New solar pump in East by end of September	Done and pumping!

Aimguard shotguns x 6 per kind favor of a young Harare based hunter

*** 3200m of piping and solar pump installation Dande East, October 2018***

10. Conservation Force

We continue to work hand in hand with John and Chrissie Jackson of Conservation Force. John and Chrissie are proud hunters and legends in the fight for our way of life and the wild places that we all love.

Conservation Force is a registered non – profit
501(c)(3) public foundation.

How to make a Tax Deductible donation.

Please make a check out to:
Conservation Force

Mail to:
C/O John J. Jackson,III
3240 S. 1-10 SERVICE ROAD W.
SUITE 200, METAIRIE,
LOUISIANA 70001
USA

Check Ref: DAPU

Conservation Force Contact:
JOHN J. JACKSON,III
TEL:(504) 837 - 1233
FAX:(504) 837 – 1145
Email: Jjw-no@att.net
Website: www.conservationforce.org

11. Flying for wildlife and others.

We must extend our thanks to:

1. Flying for Wildlife for their aerial patrols that are conducted on request. These are volunteer pilots in their own machines and they help us at NO cost to DAPU, which is tremendous.

3. Pieter Gertenbach and Charl Grobelar – farmers in the Harare area that are always helping out with mealie meal, fertilizers, soap and other ration items. We use this to supplement the DAPU rations and it is always very well received by the DAPU teams!

4. Trackit (Richard Tennant and Hannes Scholtz) who provide free, real time satellite monitoring of the two DAPU vehicles. This has really saved significantly on fuel and vehicle costs. Also of course we have been able to be much smarter with servicing, and positioning of vehicles.

12. DAPU Income and Expenses 2017

Income	
Bob Schofield	US$100
Burton Foundation	US$2,000
Communites Foundation of Oklahoma	US$2,000
David Adams	US$5,000
David Maple	US$500
DSCF.	US$24,000
Jeff Butterfield	US$250
Jeff Haulbrook	US$2,680
Jerry Beardmore	US$500
Jerry Jurena	US$600
Johnathan Frist	US$4,000
Jytte Merjtsensen	US$2,750
Martinus van der Linden	US$200
Mike Core	US$1,000
Morning Charitable Trust	US$500
Myron Repka	US$2,880
Sylvarnus Charitable Trust	US$6,000
	US$54,960
2017 Hunting clients levies and contributions.	***US$13,116***
Charlton McCallum Safaris	***US$45,540***
Total Income	***US$113,616***

Expenses

 # 1 Wages, rewards and rations.

	Game Scouts	Management Bongi, Muno Alfa & Owen.	Rations	Rewards	Fish poaching (ZAPP)	Total
January	US$1,100	US$1,605	US$770	US$784	US$250	US$4,509
February	US$1,100	US$1,605	US$770	US$150	US$250	US$3,875
March	US$1,100	US$1,605	US$770	US$19	US$250	US$3,744
April	US$1,100	US$1,605	US$770	US$133	US$250	US$3,858
May	US$1,100	US$1,605	US$910	US$9	US$250	US$3,874
June	US$1,100	US$1,605	US$910	US$118	US$250	US$3,983
July	US$1,100	US$1,605	US$910	US$439	US$250	US$4,304
August	US$1,100	US$1,605	US$910	US$48	US$250	US$3,913
September	US$1,100	US$1,605	US$910	US$1,327	US$250	US$5,192
October	US$1,100	US$1,605	US$910	US$68	US$250	US$3,933
November	US$1,100	US$1,605	US$910	US$1,574	US$250	US$5,439
December	US$1,100	US$1,605	US$910	US$34	US$250	US$3,899
Christmas	US$1,100	US$1,605	US$0	US$0	US$0	US$2,705
	US$14,300	***US$20,865***	***US$10,360***	***US$4,703***	***US$3,000***	***US$53,228***

 # 2 2017 DAPU equipment expenses

Grease Junkey repairs to AAX9832	US$5,000
Burj Auto spares for ABX 7074	US$1,267
MM Auto supplies spares and labour for ABX 7074	US$2,574
LG Harrisons Aimguard shotguns x 6	US$3,450
Uniforms	US$2,684.00
Toyota Hilux	US$27,150.00
	US$42,125.00

 # 3 Vehicles (2).

AAX 9832 = 17050 km x $0.5 x km	US$8,525
ABX 7074 = 19476 km x $0.5 x km	US$9,738
Total	***US$18,263***

Total expenses		***US$113,616***
Total Income	***US$113,616***	
Shortfall / Credit		***US$0***

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov> Fri, Aug 17, 2018 at 1:26 PM
To: Gary Shores <garys@wf.net>

Dear Mr. Shores,

Unless an applicant withdraw their application, all application request results in either a permit being issued or the application request being denied. Your application is in a "pending" status until the application is finalized.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Barry, Anna <anna_barry@fws.gov>

Gary Shores PRT #95149C

1 message

Barry, Anna <anna_barry@fws.gov> Thu, Aug 9, 2018 at 5:16 PM
To: garys@wf.net
Cc: cf@conservationforce.org

Dear Mr. Gary Shores,

The following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We will review each application received for import of sport-hunted trophies and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

Because each application now requires an individual finding under the Endangered Species Act, all application both new and ones submitted for renewal, cannot be finalized until this review process has been finalized.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Charlton McCallum
S·A·F·A·R·I·S

Dear Friends

For once we timed the end of the 2019 season with the beginning of the much awaited rainy season which has now started in earnest.

2019 has been a fantastic season for CMS in pretty much every department.

Buffalo - this year we really are seeing the benefits of voluntarily reducing our buffalo quota from 120 /year when we got the area to our present quota of 45. Our emphasis has always been on old bulls rather then spread. Considering buff take a good 7 years to develop nice solid bosses we did not see the benefit immediately but rather incrementally and we are expecting to have another excellent year next year.

Elephant - we all know the determent that the US Fish & Wildlife Service ban has had on not only our elephant hunts but the hunts country wide. This ban has also affected ours and others ability to run effective anti-poaching operations that protect the very species that the USFWS unwittingly think that they are protecting with their bans. Despite this we did do a few short elephant bull hunts in Dande which were as always great and successful hunts. Hunting an elephant bull in the Zambezi Valley is the purest and hardest form of hunting today. As a result it is the most rewarding hunt.

We also did two of our Kazuma bulls here we got a 66 and a 55 lbs in 10 days of hunting which was great.

Lion - unlike the ban on elephant the 5 year old rule on lions has indeed helped our quality and quantity of lions in Dande. We have 5 lions on quota in Dande but only sell two full bag lion hunts as we feel that taking two lions a season has no effect what so ever on the overall numbers or dynamics of lion prides in the area. This year we shot two cats that were aged 5 and 7.

Leopard - leopard continue to be excellent in Dande with 75% been shot in day light hours. We have 10 leopards on tag a year and this year we shot 8 nice male leopards of which 6 were taken in day light hours. The two failed leopards we had were unfortunate as one hunter had a nice male in the tree twice but decided the angle was not right and did not shoot and in the end time ran out.

Plains game - as always one comes to Dande to experience fantastic dangerous game hunting and to pick up a few plains game species along the way. Having said that we have had a pretty good year on plains game and have taken some great sable kudu warthog etc. Without doubt our strong anti-poaching patrols picking up snares etc have led to an increase in plains game numbers.

This year we did several hunts in Nyakasanga out of our own tented camp on the banks of the Zambezi. The hunting in this area was absolutely outstanding and it was a privilege to have had a season in this magical area. We will be selling a few buffalo and tuskless packages again there next year.

We also sent two old clients up to Luwire in Niassa in Mozambique. These are clients of ours who have hunted many times with us and all over Africa. They wanted a true wilderness area in as remote a spot as we could find. Luwire is defiantly that!! It's the old Africa that we all dream of!! While not a cheap hunt the experience and quality of the hunt is unbeatable. If you work hard in this area you have a very good chance at a dugga boy in the mid 40" like the two bulls below shot on one hunt. They went 45 and 46. The eland and sable are superb and the plains game and cats top notch also. Next year we will be selling several hunts in this un-spoilt bit of old Africa!

DAPU – continues to grow and has become a force to be reckoned with in the war against poachers. In October we sent our 22 game scouts for retraining. During that month we saw a marked increase in poaching – a sure sign that DAPU when in the field the poaching is limited.

This year we made several arrests of ivory dealers who have sourced the ivory in next door Mozambque and are trying to sell it in Zim. These dealers all received 9 years in jail.

We had less luck with the judicial system with our arrested meat poachers. One poacher we caught that we tracked from a poisoned waterhole was deemed "confused" by the judge and let off. Since then we have engaged private lawyers and law enforcement agents and have had much more success with convictions. This all costs huge amounts of money and we are grateful for all the donations towards DAPU that we receive. For more information on DAPU you can go to www.dapuzim.com

Social Developments - Apart from our 50% joint venture in hunting that sees the communities receiving 50% of the profits from all the hunts CMS has over and above that contributed to several school projects donating desks and school books at one and we are presently building a school block at another school.

We are in the process with generous help from Dallas Safari Club of up grading the national parks accommodation at Usanga Usanga post as well as having put in a super solar borehole that supplies water to the post and their vegetable gardens.

We have also drilled and equipped another solar borehole called Kavave in the east area which is pumping beautifully. This combined with the up grading of Nhemwa, the first solar borehole we have in the east has really made a difference. Buffalo herds that normally have to go to Mozambique when the pans dry up have remained year around which is very exciting indeed.

Sports has always been a great way to engage communities and this year we have supplied 18 sets of soccer uniforms to all the soccer teams in ward 1 and 2. We have also hosted our annual soccer tournament between the two wards which was won this year by ward 1. It was a very festive and successful tournament.

On a personal note i would like to thank everyone that bought my limited edition of my book “Tall Tales” it is now sold out and we are selling trade editions which are only US$45 each. These I have available and if you are interested you can get one through our website or signed at the shows.

All in all I think we can safely say that 2018 has been an excellent year for CMS and 2019 looks well set to follow in this years footsteps! We are excited to have Allan Shearing joining us in Dallas booth #2311 and Reno booth #1839/40 for the first time. Len will also be with Myles and I at the shows. Later on in the year Myles will be on the blazer booth in Salzburg representing us. We very much look forward to seeing everyone at the shows and wish all a Happy Christmas and new year. All the best Buzz, Myles and CMS.

Brisendine, Amy <amy_brisendine@fws.gov>

Fwd: [EXTERNAL] Fwd: Fw: Final newsletter 2019

1 message

Cogliano, Mary <mary_cogliano@fws.gov> Tue, Mar 19, 2019 at 5:34 PM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>

Hi Amy,

Please add the info below and attached to the appropriate Zimbabwe lion and elephant permit files.

Thank you,

Mary

---------- Forwarded message ---------
From: **Cogliano, Mary** <mary_cogliano@fws.gov>
Date: Thu, Mar 14, 2019 at 9:10 PM
Subject: Fwd: [EXTERNAL] Fwd: Fw: Final newsletter 2019
To: Mary Cogliano <mary_cogliano@fws.gov>

---------- Forwarded message ---------
From: **John J. Jackson, III** <cf@conservationforce.org>
Date: Mon, Dec 3, 2018 at 1:13 PM
Subject: [EXTERNAL] Fwd: Fw: Final newsletter 2019
To: <Mary_Cogliano@fws.gov>

Mary,

Please see the attached Charlton McCallum Safaris Newsletter. Please add the enhancement information from the newsletter on pages 5-11 for elephant and pages 11-12 for the lion to the following import trophy files:

Zimbabwe Elephant: 04846C, 14753C

Zimbabwe Lion: 95149C, 14753C

Thanks,

John

-------- Forwarded Message --------
Subject: Fw: Final newsletter 2019
Date: Mon, 3 Dec 2018 09:09:57 +0000
From:CMS <admin1@cmsafaris.com>

Good day All,

So another year draws to and end, and we are thankful for another successful hunting season. If you make it out to SCI in Reno or DSC in Dallas, pop in and say hi, book a hunt or 2:)

Wishing you all the best for 2019 and hope you all have a lovely and safe Festive Season.

CMS Team

_____

Charlton McCallum Safaris in Association with Global Marketing Consultants

Follow us on FACEBOOK: http://www.facebook.com/CMSZIMBABWE

Website | www.cmsafaris.com

Buzz Charlton Contacts
Mobile: +263 772 136 413 | Skype: charlton.mccallum.safaris

Myles McCallum Contacts
Mobile: +263 772 136 412 | Skype: myles.edward.mccallum

Emergency only (Kirsty): +263 772 232 502 (If Buzz and Myles are not available)

--
Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803
Phone: (703) 358-1991

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Mary Cogliano, Ph.D.
Chief, Branch of Permits

Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803
Phone: (703) 358-1991

Final newsletter 2018.pdf
1348K

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

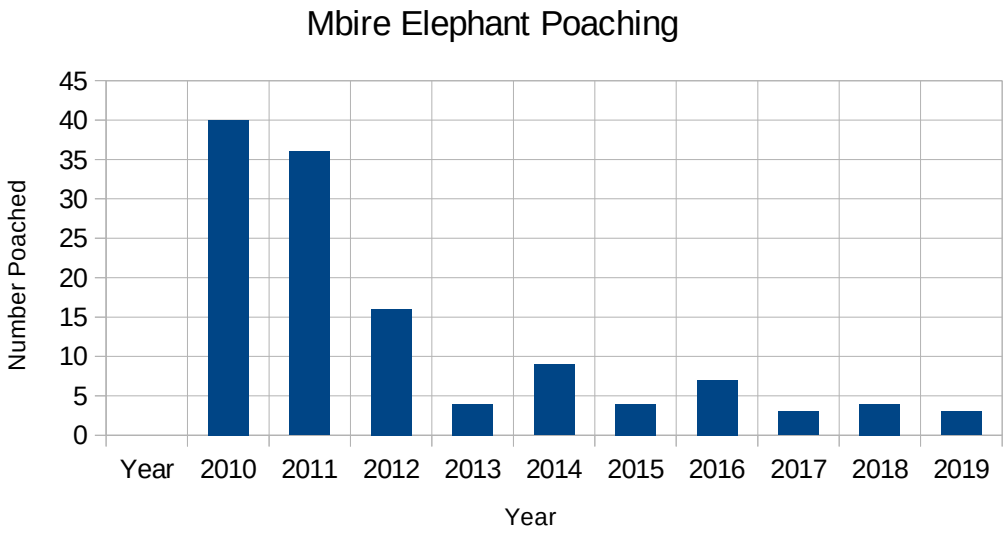


Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: Lonnie Kitt

Date: 4/16/2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

RCVD JUN 14 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Kitt	Lonnie	Jean	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Schuyler	Nebraska	68661	Colfax	U.S.A.

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U

(b) (6)

05/08/2018

Signatu ocopied or stamped signatures) Date of signature (mm/dd/yyyy)

se continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force - Phone: (504) 837-1233 Email:cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera, Panthera leo, African Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Zambia, Luangwa Valley, Nyaminga GMA near Mfuwe Town

   b. Date wildlife is to be hunted: 06/01/2018- 06/21/2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Paya Kakuli Safaris - Leon Kachelhoffer, Professional Hunter

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). HAVE NOT HUNTED YET. DO NOT hold PERMITS YET.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: MIKE BORNMAN
Business Name: BANGWEULU TAXIDERMY, LTD.
Address: 4142/K CHIFWEMA ROAD
City: NEW KASAMA, LUSAKA
State/Province:
Country, Postal Code: ZAMBIA 10101

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I und[redacted] United States, cannot be re-exported.

    Applicant's sign[redacted] Date: 05/08/2018

    Be aware th[redacted]val requirements by your local or state governments[redacted]s or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

P O.Box 32502 Lusaka 10101 Zambia Phone 0026 0955 453630/0026 0977 776010
Email. brodahood6010@hotmail.com or trophytrackersconsult@gmail.com

ENHANCEMENT REPORT

Company & Concession Description

Paya Kakuli Safaris Ltd has been operating in Nyaminga Game Management Area since 2014 .The concession is 840 square kilometers and provides habitat for a range of species including Baboon Buffalo Bushbuck Bushpig Crocodile Duiker Eland Grysbok Hippo Hartebeest Hyaena Impala Kudu Leopard Lion Oribi Puku Roan Antelope Warthog Waterbuck Cooksons Wildebeest Zebra We have a lease with the Dept of National Parks & Wildlife Services of Zambia for seven years, renewable.

The Directors are Zambian born and our Company is family owned and has been operating for seven years.We employ a Resident Professional Hunter and two other Professional Hunters & Camp Staff of 24 including Game Trackers ,Skinners, Chefs Waiters & Cleaners
Our operations support in excess of 200 dependents in the local villages. Our Lease is a comprehensive concession plan which includes anti poaching and community support.

Anti Poaching Component

Paya Kakuli Safaris employs 28 Village Scouts for Anti Poaching and spends $10,000 annually on Law Enforcement, of which $2500 is spent quarterly.Our teams work closely with the National Parks & Wildlife Services conducting comprehensive anti poaching patrols.
We also supply both food rations and fuel for the patrols and provide uniforms boots & caps.
The company has also donated Shotguns ammunition and HF Radios to assist in the anti poaching.Paya kakuli safaris supplied and erected a Transmitter/Repeater Antenna with Radios for communication ease, being vital for our Anti Poaching Patrols, which has led to numerous arrests and confiscations of snares meat and weapons.
Paya Kakuli Safaris has also undertaken the rehabilitation of the Scout Camps. Our Area is heavily patrolled and sweeps are carried out by vehicle and on foot. We also undertake all maintenance of the vehicle for Dept of National Parks & Wildlife. We have erected an an office for the Community Resources Board for Meetings and additionally donated donated bicycles to help them in their endeavours for patrolling and to sensitize and

educate the community. Our contract is such that the monies generated from the Safari Hunting is split 60/40 with dept of national Par4ks and the Local Community. In the years 2016/2017 we generated $320,000 in Area Fees & Trophy Fees.

Community Participation

Paya Kakuli Safaris are committed to support the local community and to this end 50% of the meat derived from our safaris is donated and delivered to them. In addition we have put in 4 Boreholes and Medical Clinic, House for Teaching Staff and a Dormitory for Girls and the School.We have also donated a Motor Vehicle for Community Based Projects and Anti Poaching.

Habitat Protection & Conservation Development

Our anti poaching efforts have allowed the Game Population to improve over the three years we have had the concession. We have deepened 7 of the animal watering holes and have filled these with water from the newly dug boreholes when there is a shortage of water.
In our efforts to survey Lion in our Area we record sightings,spoor and as much data as is known on any individual. Because we are keeping these records we ensure that our limited offtake is sustainable. We also follow the age based policy of not harvesting Lions below the age of 6 years.

The Majority of our Lion and Elephant Hunters are from the United States and these hunters follow conservation ethics that see them contributing above their fees to the community and towards anti poaching in the Hunting Area.
The revenue from Lion and Elephant Hunting are our highest value hunts and generate approximately 50% of our overall revenue and Lion alone approx 35%.

In summation, Paya Kakuli Safaris sustainable hunting program not only enhances the sustainability of the survival of the Lion and all Wildlife in our Area but it also serves to protect the habitat. Revenue generated by the Safari Company demonstrates the value of the Wildlife to the local community and provides an incentive to ensure this natural resource is around for generations to come.

ATTACHMENTS

Map of Game Management Area

Supportive Letters/acknowledgements from village/district leadersChief Kazembe

Anti poaching reports

Letters of Donation Receipt for :

Motor Vehicle
Shotguns & Ammunition
HF Radios
Community Based Projects for Local Community.

Photographs of :

Poachers and Illegal Timber Cutters Apprehended

Transmitter/Repeater Installations

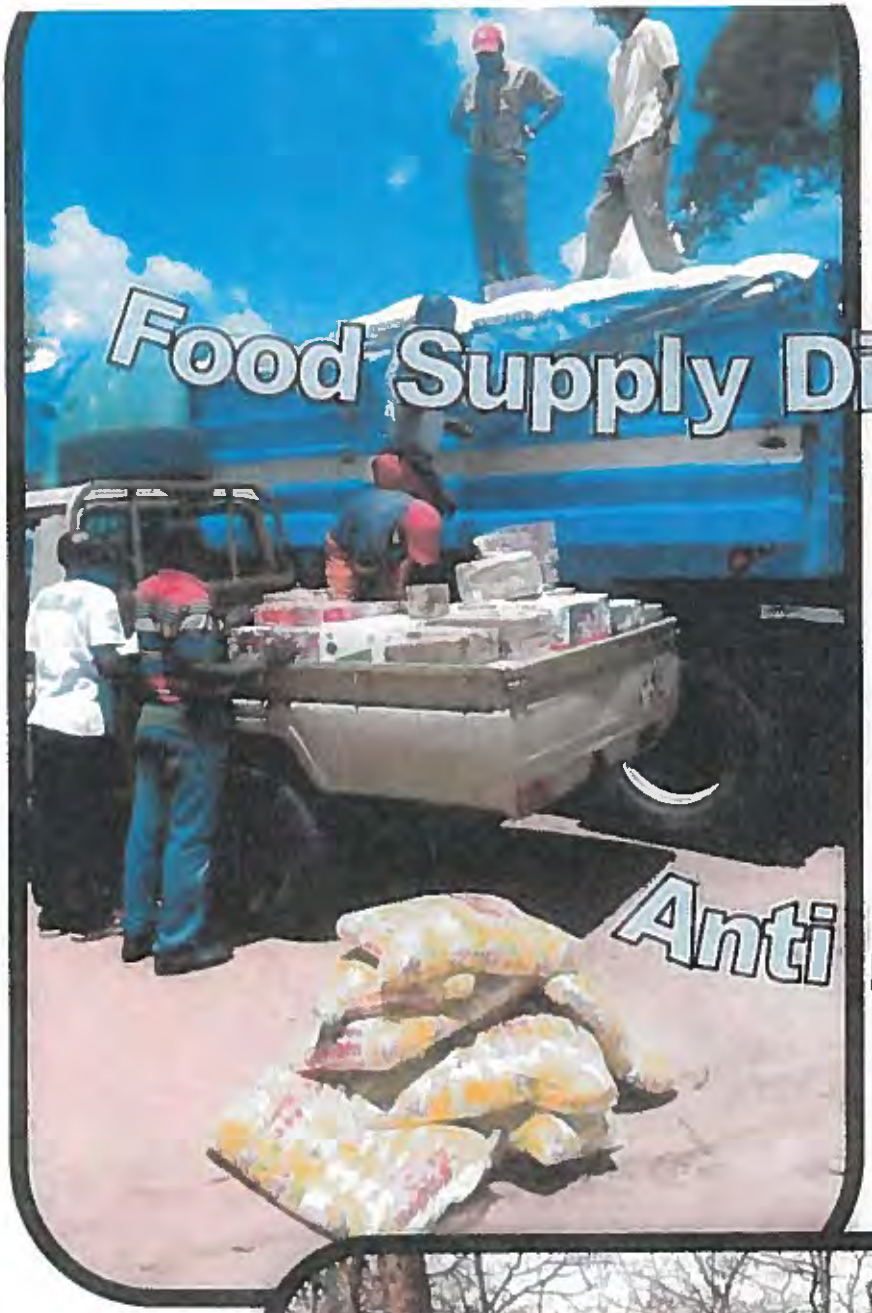
Meat Districbution to Villagers

Supply Rations to Scouts/Anti Poaching Patrols

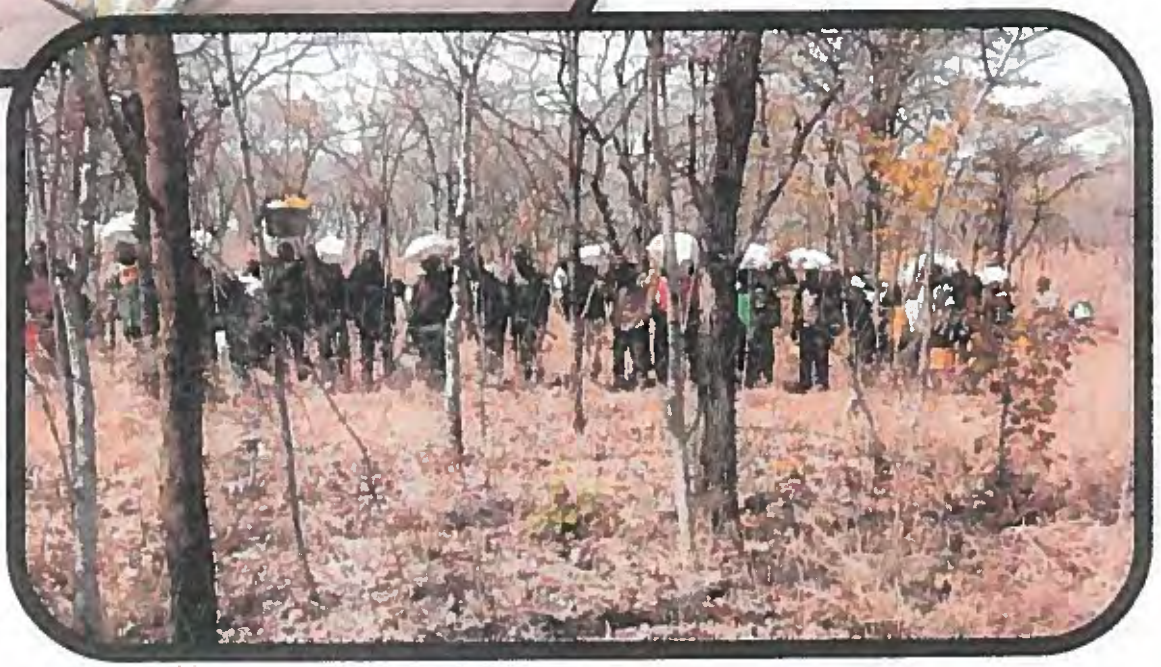
Meat Distribution to Villagers

Poachers Caught

Illegal Timber Apprehended



Anti Poaching



Radio Transmitter & Repeater

Communication Network for Anti Poaching Patrols

MINISTRY OF TOURISM & ARTS

Department of National Parks and Wildlife

Private Bag 1, Kafue Road, Chilanga, Zambia
Telephone: +260-211-279080 / 278366 / 278555 / 278365
Telefax: +260-211-278524 / 278244 / 278471
Email: info@ zawa.org.zm

All correspondence should be addressed to the Director

12th April, 2017

The Director
Paya Kakuli Safaris
LUSAKA

REF: HANDING OVER OF COMMUNITY VEHICLE REGISTRATION NUMBER ABD 561

The captioned subject matter refers.

We are delighted to inform you that after a comprehensive assessment of the Land Cruiser hard top bearing registration number ABD 561 by our Workshop Foreman in presence of His Royal Highness Chief Kazembe, the Wildlife Ranger based in Lundazi and CRB Chairperson, we are hereby beseeching the release of the captioned vehicle to Kazembe Community Resources Board as per agreement embedded in the documented minutes dated 13th February, 2017.

Further, we are also pleased to learn that your company will be rendering free intensive vehicle service once a year for the entire period of the Hunting Concession Agreement amidst the routine auto service requirements that will be financed by the CRB. This gesture will enhance supplementary efforts in maintaining road worthiness of the vehicle while prolonging its life span.

In view of the foregoing, it is a firm anticipation of the Department that all parties involved will abide by the terms of reference vividly stipulated in both the consent letter and minutes. By and large, the Department is therefore not sceptical that the aforementioned vehicle will assist in enhancing the tenets of Community Based Natural Resources Management and resource protection in Lumimba GMA.

Yours faithfully

Paul Zyambo
DIRECTOR

Southern Region Office
P.O. Box 60086
Livingstone
Tel: +260-213 321396

Eastern Region Office
P.O. Box 18
Mfuwe
Tel: 062 45021 / 062 45042

Northern Region Office
P.O. Box 710393
Mansa
Tel: +260-212-8221735

Western Region Office
P.O. Box 830124
Mumbwa
Tel: 01 800056

MINISTRY OF TOURISM & ARTS

Department of National Parks and Wildlife

Private Bag [illegible], Kafue Road, Chilanga, Zambia
Tel phone +260 [illegible]
Telefax +260 21[illegible]
Email: info@[illegible]

All correspondence should be addressed to the Director

7th June, 2017

The Director
Pava Kakuli Safaris Limited
P.O. Box 32502
Bwinjimfumu Road
LUSAKA

Dear Sir,

REF: DONATION OF TWO HIGH FREQUENCY (HF) RADIOS

Reference is hereby made to your letter dated 17th May, 2017, in which you pledged to donate two (2) High Frequency Radios under Law Enforcement Pledge for the fiscal year 2017 to Zokwe Camp for communication purposes.

The Department wishes to thank you for this timely gesture that will significantly contribute to the emergency and security communication needs of Zokwe Camp and its surrounding areas. Most importantly, this trend is firmly anticipated to enhance resource protection in the respectively Game Management Area.

Lastly, the Department would like to express its sincere gratitude for the conservation partnership your company has continued exhibiting especially in the areas of resource protection and socio-economic development.

Yours faithfully,

Austin Mwakifwamba
ACTING DIRECTOR – DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
***for*/PERMANENT SECRETARY – MINISTRY OF TOURISM AND ARTS**

Tel: +260 211 223930
Fax: +260 211 223930
Telex: ZA 45510
Email: psmta@mta.gov.zm

REPUBLIC OF ZAMBIA

MINISTRY OF TOURISM AND ARTS

OFFICE OF THE PERMANENT SECRETARY

KWACHA HOUSE
CAIRO ROAD
P.O. Box 30575
10101 LUSAKA

In reply please quote

No.....

MTA/NPW/4/9/1sec

18th December, 2017

The Director
Paya Kakuli Safaris Limited
Plot No. 284 Bwinji Mfumu Road
P.O. Box 32502
LUSAKA

RE: DONATION OF SIX SHOT GUNS TO THE DEPARTMENT OF NATIONAL PARKS AND WILDLIFE FOR OPERATIONS IN NYAMINGA HUNTING BLOCK

The above captioned subject matter refers.

The Ministry of Tourism and Arts wishes to acknowledge receipt of your letter dated 11th December, 2017 in which you donated Six (6) Shot guns to the Department of National Parks and Wildlife for operations in Nyaminga Hunting Block (your concession area) for the year 2018.

The Ministry is grateful of your donation and wishes other safari hunting outfitters would emulate your gesture. We would like to assure you that the fire arms will be put to good use.

Looking forward to continue working with you.

pp

Liya Nawa Mutale (Dr.)
Permanent Secretary
MINISTRY OF TOURISM AND ARTS

PAYA KAKULI SAFARIS

Paya Kakuli Safaris Limited

Address : Plot 284 Bwinjimfumu Road . P O Box 32502,Lusaka
Email : brodahood6010@hotmail.com
Tel : +260 977-776010

THE DIRECTOR GENERAL

National Parks and Wildlife

Headquarters, Chilanga

Lusaka Province

Zambia.

06/10/2016.

DEAR SIR,

RE: **DONATION OF 6 SHOTGUNS & 50 AMMUNITIONS**

Kindly receive a donation of 6 shot guns and 50 ammunitions as promised by Paya-kakuli safaris for Nyaminga hunting Block.

YOURS FAITHFULLY,

Faizel Lulat – DIRECTOR

Received by :

Mbuthia Community Resource Board

On 2nd April 2016. The board had a meeting at Mbuthia wildlife camp to budget on the KES 5m allocation for 2015 pledge money. The board resolved and agreed to remunerate:

1. 1 teacher's house at Mbuthia primary (1) amounting KES 7,500
2. Chuka Community school amounting KES 120,000
3. Zone - 1 teacher's house amounting KES 150,000
4. Completion of one classroom at Mgumo Day Secondary School to be 50% of amount.

Three quotations were collected from three different suppliers namely.

1. Christopher Enos Hardware - KES 12,825
2. Mbae Trading - KES 13,555
3. Gichuki Enterprise KES 13,650

The board had choosen Christopher Enos who had the lowest price.

Moses Kimani
Chairman

KAZEMBE COMMUNITY RESOURCE BOARD (CRB)
P.O Box 530007
Lundazi

24.03.2018

TO WHOMEVER MAY CONCERN

KAZEMBE COMMUNITY RESOURCE BOARD 2017
RECOMMENDATION REPORT

We the people living within the confines of Kazembe Chiefdom, in order to manage effectively commercial business of Wildlife and other resources, established a Community Resource Board to the powers entrusted in us, under the Zambia Wildlife Act Number 12 of 1998.

An agreement was made and entered on 16th day of March 2015 between the Zambia Wildlife Authority by then but now Department of National Parks and Wildlife (DNPW), the outfitter Pava Safaris and the Kazembe Community, under the Zambia Wildlife Act Number 12 of 1998.

The Parties agree and acknowledged that the agreement shall be governed by and construed in accordance with the Laws of the Republic of Zambia.

Objectives

- To protect Wildlife and other Natural resources and to prevent all forms of illegal use of natural resources.
- To provide an environment conducive to a positive relationship with Safari Hunting companies (and their Clients)
- To increase the population of wildlife in the area.

Benefits from:

- Concession

In 2017, 107,000 USD was received from animals fees and was divided into three categories such as 20% which went to CRB Administration from it 1x6 CRB Office Block was erected at Kazembe Headquarters, 14 Bicycles for CRB members were bought to patrol and sensitize community members on conservation and other office equipment were procured, 35% it was spent on community development e.g. Infrastructure developments such as (Clearing of hunting Roads, 1x10 compartments Girls dormitory was constructed at Kazembe Secondary

School. 3 Teachers houses were Constructed and 1 house at Zokwe for a Nurse was constructed.

45% was spent on 28 Village Scouts salaries who are CRB employees. Field Patrol Rations was bought for 4 Camps used to combust poaching in the area. Patrol gear such as Camping Tents and Uniforms were bought. The Company supported four (4) CRB quarterly meetings on planning and budgeting.

50% of all edible meat was distributed to all VAGs and to DNPW according to the concession agreement.

57000 USD was paid by Safari Company to the Government as a concession fee where 50% goes to the Government and 50% is plowed back to the community.

10000 USDwas spent on Law Enforcement independently of which every quota of the year 2,500USDis spent on field Patrol food packs, for four (4) wildlife camps within the Hunting block.

2120 USDis spent by the company on yearly evaluation meeting by Department ofNational Parks and Wildlife and other stake holders to know the performance of the Company to which 2017 performanceof Companywas tremendously good.

- Obligation

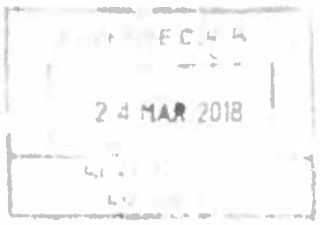
Six (6) Firearms and 50 x 12 bore ammunitions were provided to combust poaching in the Game Management Area within the hunting block.

- Pledge

One Motor Vehicle for the Community was purchased (Land Cruiser) and annually servicing is done by the Safari operator.Maintenance of DNPW Motor Vehicle is as well done by the operator. Four (4) Bore holes in the Community were drilled. Two (2) HF Radios for communication in the area wereprovided by the Safari Companyand (1) Tower was erected for signal.

Financial support and logistics for on the spot anti-poaching activities is provided such as fuel deploying officers in the field, transport costs by taking suspects to and from Court, informer incentives and some other Courtlogistics.

REPUBLIC OF ZAMBIA
CHIEF KAZEMBE
NYIMBWE HEADQUARTERS
24 MAR 2018
CHIEF'S OWN PALACE
P/A KAULASISI
LUNDAZI


24 MAR 2018

His Royal Highness Chief Kazembe
Chief's own Palace
Nyimbwe Palace
P/A Kaulasis
Lundazi
18th February 2016,

THE DIRECTOR GENERAL,
NATIONAL PARKS AND WILDLIFE (ZAWA),
PRIVATE CHIANGA,
LUSAKA.

Dear Sir,

SAFARI OPERATOR'S COMMITMENT TO KAZEMBE COMMUNITY

Kindly refer to the above captioned subject matter. So far, I have had no problems, dealing with the safari operator, director for safari hunting company **paya – kakuli**. Mr **Faizel Lulat** has had a very good working relationship with me the patron for Kazembe Community Resource Board (CRB) in Nyaminga Hunting Block and the community at large. He has always wanted to consult (ZAWA) and me the now **National Parks and Wildlife** when it comes to the issues to do with Kazembe Community Development, he wants transparency in his dealings. The Community Resource Board for Nyaminga Hunting Block, National Parks and Wildlife should work together in consultation so that there is proper transparency in all transactions. He will always want the consent and the knowledge of the Patron and National Parks and wildlife (ZAWA) before he does anything, as he already made funds available for his obligations to the community to avoid any confusions.

Your assistance and understanding on this matter will highly be appreciated.

Yours Faithfully,

The Patron,

Kazembe Community Resource Board.

Chief Kazembe

BANDA VINCENT

REPUBLIC OF ZAMBIA
CHIEF KAZEMBE
NYIMBWE HEADQUARTERS
18 FEB 2016
CHIEF'S OWN PALACE
P/A KAULASISI
LUNDAZI

Cc. Area Warden - Chipata

Cc. Director – Finance

Cc. The Officer – CBNRM

Cc. Park Ranger - Lundazi

I Tennyson Mumba Senior Legal Officer under Department of National Parks and Wildlife acknowledge receipt of K21,200 for Evaluation Exercise of the Hunting Concession Agreement for Paya Katuli

AG/SLO
01/11/17

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ____ Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   b. Sex (if known).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   ZAMBIA
   LUANGWA VALLEY. NYAMINGA GMA NEAR MFUWE TOWN

   b. Date wildlife is to be hunted: JUNE 1ST TO 21ST, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   PAYA LAKULI SAFARIS. PROFESSIONAL HUNTER LEON VACHELHOFFER

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

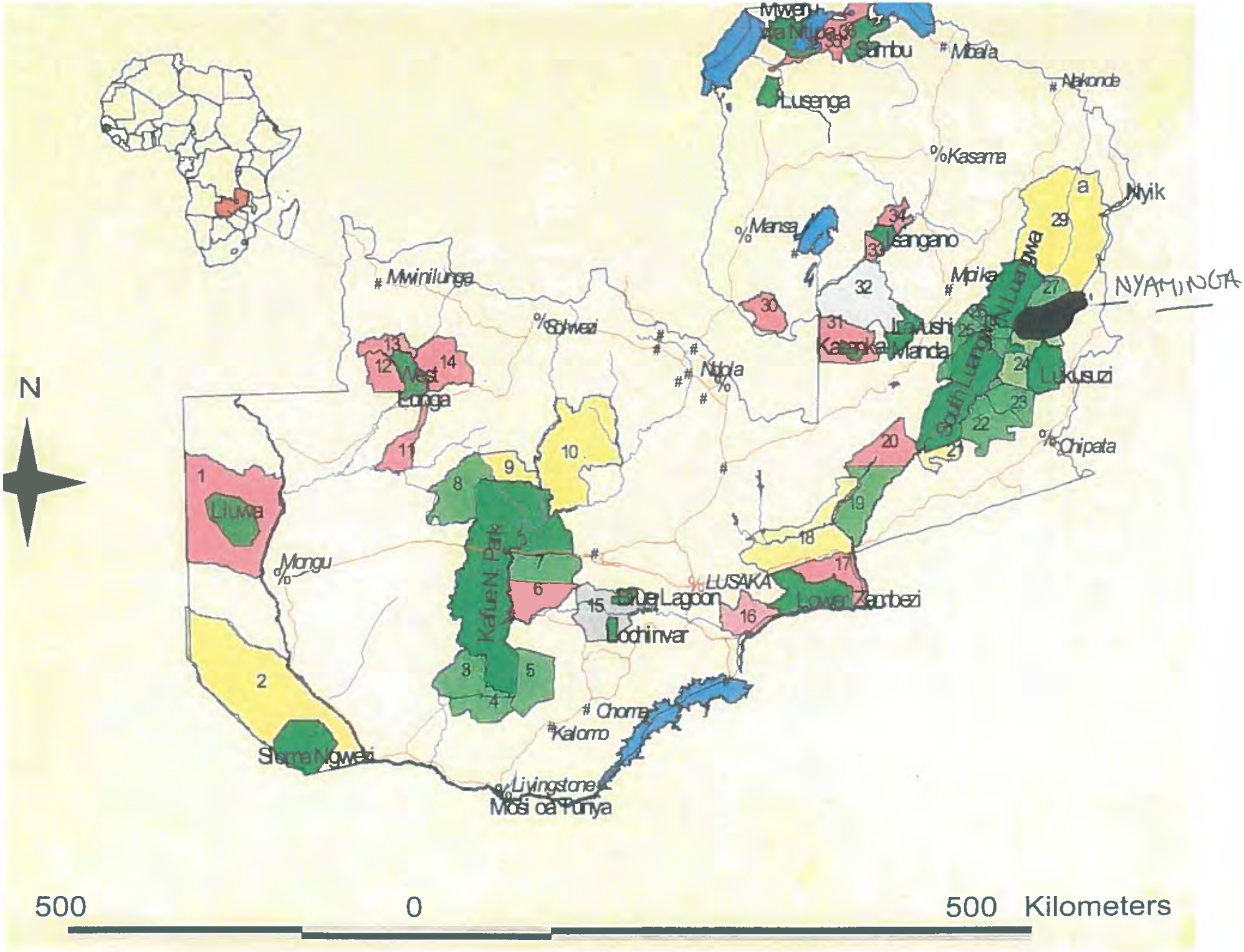
Name: MR. MIKE BORNMAN
Business Name: BANGWEULU TAXIDERMY LTD.
Address: 4142/K CHIFWEMA ROAD
City: NEW KASAMA, LUSAKA
State/Province:
Country, Postal Code: ZAMBIA 10101

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?


Mwer
Nchelenge
Samfya
Mbala
Nakonde
Lusenga
Kasama
Mansa
Isangano
Mpika
Nyik
NYAMINGA
Mwinilunga
Solwezi
Ndola
West Lunga
Kabompo
Kaputa
Luapula
Mpanda
Lukusuzi
South Luangwa
Chipata
Liuwa
Mongu
Kafue N. Park
LUSAKA
Blue Lagoon
Lochinvar
Lower Zambezi
Chomba
Kalomo
Sioma Ngwezi
Livingstone
Mosi oa Tunya
N
500
0
500 Kilometers

Re: Lion Trophy Application - June 23 Surname

Vargas, Darcy <darcy_vargas@fws.gov>

Thu 9/20/2018 1:14 PM

To: Barry, Anna <anna_barry@fws.gov>

The application states that the lion would be harvested between June 1 through June 21 of 2018.

Conservation Force is referenced.

I am uncertain if the lion was actually harvested because I have been directed not to ask. I personally, think it is important to wait until the lion is hunted so age can be verified for lions hunted in Zambia, but I have been told that I can not require the hunt to have occurred before we issue our permit.

--
Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmIC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

On Thu, Sep 20, 2018 at 1:06 PM, Barry, Anna <anna_barry@fws.gov> wrote:

> I do not have any lion applications for you. When was this lion harvested?
>
> Anna Barry
> Senior Biologist
> USFWS/Division of Management Authority
> Branch of Permits, MS: IA
> 5275 Leesburg Pike
> Falls Church, VA 22041-3803
> 1-800-358-2104, ext. 1976 or 703-358-1976
> Fax: 703-358-2281
> E-mail: Anna_Barry@fws.gov
>
> *Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.*

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Thu, Sep 20, 2018 at 1:02 PM, Vargas, Darcy <darcy_vargas@fws.gov> wrote:

> Hi Anna and Mary,
>
> Ref: Status of # 95152C lion trophy surname.
>
> I am double checking on the status of my lion application surname. I was reviewing a new lion application today and I noticed that the last lion application I worked on and referenced above has been with Mary since June 23, 2018, so I want to make sure that it didn't get lost in all our acting changes (in SPITS it says Mary, but I am not sure if it was transferred to Anna).
>
> Please let me know if you need me to print another surname package.
>
> Thanks,
> Darcy
>
> --
> Darcy Vargas
> Biologist
> US Fish and Wildlife Service
> MS: IA
> 5275 Leesburg Pike
> Falls Church, VA 22041-3803
> www.fws.gov
> www.cites.org
>
> ***Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!***
>
> If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Re: Lion Trophy Application - June 23 Surname

Cogliano, Mary <mary_cogliano@fws.gov>

Fri 9/21/2018 5:12 PM

To: Vargas, Darcy <darcy_vargas@fws.gov>
Cc: Barry, Anna <anna_barry@fws.gov>

Hi Darcy,

I had asked Mike to review it, so I'll check in with him on Monday. Thanks much for following up on this!

Mary

On Thu, Sep 20, 2018 at 1:02 PM Vargas, Darcy <darcy_vargas@fws.gov> wrote:

> Hi Anna and Mary,
>
> Ref: Status of # 95152C lion trophy surname.
>
> I am double checking on the status of my lion application surname. I was reviewing a new lion application today and I noticed that the last lion application I worked on and referenced above has been with Mary since June 23, 2018, so I want to make sure that it didn't get lost in all our acting changes (in SPITS it says Mary, but I am not sure if it was transferred to Anna).
>
> Please let me know if you need me to print another surname package.
>
> Thanks,
> Darcy
>
> --
> Darcy Vargas
> Biologist
> US Fish and Wildlife Service
> MS: IA
> 5275 Leesburg Pike
> Falls Church, VA 22041-3803
> www.fws.gov
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>
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>
> If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

--
Mary Cogliano, Ph.D.
Chief, Branch of Permits

Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803
Phone: (703) 358-1991

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

March 5, 2019

In Reply Refer To:
FWS/AIA/DMA/PRT-95152C

Enhancement Finding
Applicant: Lonnie Jean Kitt (PRT-95152C)

Lonnie Jean Kitt submitted an application on June 14, 2017, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy, taken between June 1, 2018, and June 21, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United

States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Lonnie Kitt's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Nyaminga GMA, Luangwa Valley, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Lonnie Kitt's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that

have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Lonnie Kitt's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Lonnie Kitt's application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will

regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Lonnie Kitt's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Lonnie Kitt will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Lonnie Kitt, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Lonnie Kitt.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to Lonnie Kitt, to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service is able to authorize the import of one male wild lion trophy taken in Zambia, to Lonnie Jean Kitt.

Darcy Vargas

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

RCVD JUN 27 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Allen	Chad		

(b) (6)

4. E-mail address: lisaQdlclb.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6)

1.a. City	1.b. State	1.c. Zip code/Postal code	1.e. County/Province	1.f. Country
Cleburne	TX	76033	Johnson	U.S.A

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100. Federal**, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Lisa Jamnik 6/18/2013

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

DHL GWB, LLC Ste W201
1500 Midway Crt,
Elk Grove Village, IL 60007

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Lisa Jamnik 847-690-0690
lisaj@dlclb.com

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera Leo melanochaita

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   n/A

   b. Date wildlife is to be hunted:

   n/A

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   n/A

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   Umfurudzi Game Park, Masanaland West, GIS 686001 Harare

   b. Date wildlife was hunted:

   11/11/2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Umfurudzi Park
Richard Tabor

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Colletts Wildlife Artistery
15 Josiah Chinamano Rd
Belmont, Bulawayo Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

See attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

Colletts Wildlife Artistery
15 Josiah Chinamano
Belmont, Bulawayo
Zimbabwe

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

not available

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

not available

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

not available

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: Susan Jamnik Date: 6/18/2018

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Chicago

#9494

CUSTOMS POWER OF ATTORNEY
and
Acknowledgement of Terms and Conditions of Service

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.
(Revised 07/04)

✓ appropriate box:
- [x] Individual
- [ ] Partnership
- [ ] Corporation
- [ ] Sole Proprietorship
- [ ] Limited Liability Company

SS# (b) (6) [redacted]

KNOW ALL MEN BY THESE PRESENTS: That, ✓ CHAD E. ALLEN (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify) doing business as a ✓ INDIVIDUAL (individual, partnership, corporation, sole proprietor) under the laws of the State of ✓ TEXAS, residing or having a principal place of business at (b) (6) [redacted] CLEBURNE, TX, hereby constitutes and appoints ✓ D&L CHB, LLC (Grantee's Name), its officers, employees, and/or specifically authorized agents, to act for and on its behalf as a true and lawful agent and attorney of the grantor for and in the name, place and stead of said grantor, from this date

In the United States (the "territory") either in writing, electronically, or by other authorized means, to:

Make, endorse, sign, declare, or swear to any customs entry, withdrawal, declaration, certificate, bill of lading, carnet or any other documents required by law or regulation in connection with the importation, exportation, transportation, of any merchandise in or through the customs territory, shipped or consigned by or to said grantor;

Perform any act or condition which may be required by law or regulation in connection with such merchandise deliverable to said grantor; to receive any merchandise;

Make endorsements on bills of lading conferring authority to transfer title; make entry or collect drawback; and to make, sign, declare, or swear to any statement or certificate required by law or regulation for drawback purposes, regardless of whether such document is intended for filing with U.S. Customs and Border Protection;

Sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits or statements in connection with the entry of merchandise;

Sign and swear to any document and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated by said grantor;

Authorize other Customs Brokers duly licensed within the territory to act as grantor's agent; to receive, endorse and collect checks issued for CBP duty refunds in grantor's name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor;

And generally to transact Customs business, including filing of claims or protests under section 514 of the Tariff Act of 1930, or pursuant to other laws of the territories, in which said grantor is or may be concerned or interested and which may properly be transacted or performed by an agent and attorney;

Giving to said agent and attorney full power and authority to do anything whatever requisite necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents;

This power of attorney to remain full force and effect until revocation in writing is duly given to and received by grantee (if the donor of this power of attorney is a partnership, the said power shall in no case have any force or effect in the United States after the expiration 2 years from the dates of its execution);

Grantor acknowledges receipt of ✓ D&L CHB, LLC (Grantee's Name) Terms and Conditions of Service governing all transactions between the Parties.

If the Grantor is a Limited Liability Company, the signatory certifies that he/she has full authority to execute this power on behalf of the Grantor.

IN WITNESS WHEREOF, the said ✓ CHAD E. ALLEN

caused these presents to be sealed and signed: (Signature) (b) (6) [redacted]

(Capacity) ✓ N/A Date: ✓ 10-10-2011

Witness: (if required) N/A

If you are the importer of record, payment to the broker will not relieve you of liability for CBP charges (duties, taxes or other debts owed CBP) in the event the charges are not paid by the broker. Therefore, if you pay by check, CBP charges may be paid with a separate check payable to "U.S. Customs and Border Protection" which shall be delivered to CBP by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

We the People
Of the United States,
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
UNITED STATES OF AMERICA
USA
(b) (6)
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UNITED STATES OF AMERICA
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United States
Department of State
SEE PAGE 51
USA
P<USAALLEN<<CHAD<EDWARD<<<<<<<<<<<<<<<<<<<<<<
(b) (6)

CHAD ALLEN - LION

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000079977
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Tradelk Trading (Pvt) Ltd	Client's Full Name	Chad Allen
ZTA (HOP) No.	HOP0304	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	11 Hazeldene Road Borrowdale Harare	Address	(b) (6) Cleburne TX76033
Name of Professional Hunter	G WHITTAL	Licence No.	421
Telephone		Fax	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	COLLETTS WILDLIFE ARTISTRY	Address	15 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Shipping Agent	MAPLE SHIPPING AND FREIGHT	Address	4 BELMONT ROAD, BULAWAYO
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Humani	Masvingo	
2	Bedford	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	11-12-2017
Date of Safari To	20-12-2017
Daily Rate Charged For Big Game USD	400.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	27-FEB-2018	DMS/4625	14-MAR-2018	USD	28,161	28,161
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	4,466.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	23,300.00
Other fees (Incidentals)	395.00	Grand Total USD	28,161.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Humani	vn137425	15-DEC-2017	24 5/7	21,000
2	GIRAFFE	M	Killed	Humani	VN162309	14-DEC-2017		1,500
3	HYENA	M	Killed	Humani	vn067227	16-DEC-2017	19	800
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

SECTION A: LEOPARD HUNT RETURN FORM

1. TR2 SERIAL NUMBER: 00000 79977
2. HUNTING OUTFITTER: TROPEEK TRADING (PVT) LTD.
3. PROFESSIONAL HUNTER: GUY WHITTALL
4. PROPERTY/CONCESSION/CAMPFIRE AREA NAME: HUMANI
5. MINIMUM NUMBER OF DAYS BOOKED FOR LEOPARD HUNT: 14
6. i) BAIT & BLIND [✓] ii) ON FOOT [ ] iii) HOUNDS [ ]
7. i) RIFLE [ ] ii) SHOTGUN [ ] iii) HANDGUN [ ] iv) BOW [ ]
8. i) SUCCESSFUL HUNT [ ] ii) FAILED HUNT [✓]

Only complete questions 9-10 if a hunt was unsuccessful
9. WAS A LEOPARD WOUNDED DURING A FAILED HUNT Y N
10. IF HUNT FAILED, WHAT WAS THE REASON?

Complete 11-14 for both successful and unsuccessful hunts
11. TOTAL NUMBER OF BAIT NIGHTS

12. NUMBER OF LEOPARDS RECORDED ON BAITS

Sex/Age	Number	Evidence (sighting, tracks, trail camera)
Adult male		
Adult female		
Subadult male		
Subadult female		
Unknown		

13. DATE OF HUNT START

Complete questions 14-17 if a leopard was shot
14. HOW MANY DAYS INTO HUNT WAS LEOPARD SHOT
15. GPS POSITION
16. SKULL LENGTH (inches) 17. SKULL BREADTH (inches)
Trophy Y N (to be completed by PH/PHA)
18. ESTIMATED AGE OF LEOPARD TAKEN
i) <2 [ ] ii) 2-3 years [ ] iii) 4-6 years [ ] iv) ≥7 years [ ]

Complete questions 19-20 if a hound hunt
19. NUMBER OF DIFFERENT LEOPARD CHASED
20. ESTIMATED LENGTH OF ALL CHASES COMBINED (km)

COMMENTS WE APPLIED FOR A PERMIT AS WE HAD QUOTA AVAILABLE. CLIENT DID NOT FOLLOW UP ON OFFERS.

SECTION B: LION HUNT RETURN FORM

1. TR2 SERIAL NUMBER: 00000 79977
2. HUNTING OUTFITTER: TROPEEK TRADING (PVT) LTD
3. PROFESSIONAL HUNTER: GUY WHITTALL
4. PROPERTY/CONCESSION/CAMPFIRE AREA NAME: HUMANI
5. MINIMUM NUMBER OF DAYS BOOKED FOR LION HUNT: 10
6. i) BAIT & BLIND [ ] ii) ON FOOT [ ]
7. i) RIFLE [✓] ii) SHOTGUN [ ] iii) HANDGUN [ ] iv) BOW
8. i) SUCCESSFUL HUNT [✓] ii) FAILED HUNT [ ]

Complete question 9 if a hunt was unsuccessful
9. WAS A LION WOUNDED DURING A FAILED HUNT Y (N)
10. IF HUNT FAILED, WHAT WAS THE REASON?
11. TOTAL NUMBER OF BAIT NIGHTS

12. NUMBER OF LIONS RECORDED ON BAITS

Sex/Age	Number	Evidence (sighting, tracks, trail camera)
Adult male	1	VISUAL DURING THE BAIT
Adult female	5	" " " "
Subadult male	4	" " " "
Subadult female	2	" " " "
Unknown	–	" " " "

13. DATE OF HUNT START 11-12-17
Complete questions 14-18 if a trophy was taken
14. NUMBER OF DAYS INTO HUNT LION SHOT 5
15. GPS POSITION 20 137 425
16. SKULL LENGTH (inches) 16" 17. SKULL BREADTH (inches) 8 5/8
Trophy Y N (to be completed by PH/PHA)
18. ESTIMATED AGE OF LION TAKEN
i) <4 years [ ] ii) 4-5 years [ ] iii) ≥6 years [✓]
19. SEX OF LION HUNTED M F

COMMENTS MORN LION WAS SHOT @ 5:30 PM.

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] Chad Allen PRT 98120 leopard & PRT 98157C

2 messages

Lisa Jamnik <LisaJ@dlchb.com> Tue, Jul 10, 2018 at 2:03 PM
To: "anna_barry@fws.gov" <anna_barry@fws.gov>, "stephanie_whitley@fws.gov" <stephanie_whitley@fws.gov>

Hi Stephanie & Anna

Sorry for all the confusion, Anna, Stephanie and I spoke on the phone please see the corrected date of birth, along with his passport – which I circled the date of birth – and an email we received giving us his date of birth. Anna, Stephanie said she would review with you because she check to find out what needed to be done. If you have any further questions please let me know. Thanks Lisa

****WE ARE MOVING PLEASE SEE OUR NEW OFFICE DETAILS***

D&L CHB, LLC

2015 S. ARLINGTON HEIGHTS, SUITE 123

ARLINGTON HEIGHTS, IL 60005

Telephone and fax numbers will remain the same

****PLEASE LIKE US ON FACEBOOK****

GO TO D&L CUSTOM HOUSE BROKERS

Thank You & Best Regards,

Lisa Jamnik

D&L CHB

T:847-690-0690

F:847-690-0699

C:262-949-1730

Whitley, Stephanie <stephanie_whitley@fws.gov> Tue, Jul 10, 2018 at 2:47 PM
To: Lisa Jamnik <LisaJ@dlchb.com>
Cc: "anna_barry@fws.gov" <anna_barry@fws.gov>

Lisa,

Were there supposed to be attachments?

Stephanie
[Quoted text hidden]
--

Stephanie Whitley
Legal Instrument Examiner
U.S. Fish & Wildlife Service - Headquarters
Attn Division of Management Authority - Branch Of Permits
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
703-358-1982 (Telephone)
703-358-2280 (Facsimile)
stephanie_whitley@fws.gov

www.fws.gov
www.cites.org

Interested in international conservation? Sign up for our e-newsletter! ***Sign up***

Lisa Jamnik

From: Michelle Buchanan <michelle@buchananhunts.com>
Sent: Thursday, April 26, 2018 2:46 PM
To: Lisa Jamnik; 'OUTBOUND/MICHELLE'
Cc: Laura Durgin
Subject: RE: Chad Allen Leopard and Lion

Hi Lisa
Date of Birth – (b) (6)
County – (b) (6)

Have you got the rest of the answers or am I getting the wrong end of the stick?

Kind Regards,

Michelle Buchanan
Director

RSA Cell: +27 711 886584 | USA Cell: +1 817 933 9213
michelle@buchananhunts.com
michelle.buchanan2

www.buchananhunts.com

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The information in this email is both confidential and privileged. It is intended solely for the addressee. If you are not the intended recipient, any disclosure, copying, distribution or any action taken (or omitted) in reliance on it is forbidden and may be unlawful. Whilst all reasonable steps are taken to ensure the accuracy, confidentiality and integrity of information and data transmitted electronically, no liability or responsibility whatsoever is accepted if information or data is, for whatever reason, corrupted or does not reach its intended destination

From: Lisa Jamnik <LisaJ@dlchb.com>
Sent: Thursday, April 26, 2018 5:04 PM
To: OUTBOUND/MICHELLE <michelle@outboundexports.com>
Cc: Laura Durgin <Laura.Durgin@dlchb.com>; Michelle Buchanan (michelle@buchananhunts.com) <michelle@buchananhunts.com>
Subject: FW: Chad Allen Leopard and Lion
Importance: High

Lisa Jamnik

From: SPITS-II Production Email Messenger <permits@fws.gov>
Sent: Wednesday, June 27, 2018 1:00 PM
To: Lisa Jamnik
Cc: permits@fws.gov
Subject: Jun 27 2018 2:00:00; Acknowledgement letter for Permit No. "98157C""

CHAD ALLEN
908 CANYON RD
CLEBORNE, TX 76033
U.S.A.

lion

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 06/27/2018; check number 161088 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA98157C-0While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices. While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

98157C

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

(b) (6)

1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
(b) (6)		

4. E-mail address: lisaj@dlclb.com

Section B: Complete if applying on behalf of business, agency, Tribe, or institution

		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

(b) (6)

Section C: All applicants must complete

1.a. Physical address (include name of contact person if applicable)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cleburne	TX	76033	Johnson	U.S.A
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Lisa Jamnik 6/18/2013

Please continue to next page

Form 3-200-19

98120

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Se

[redacted]

1.c. Middle Name/Initial	1.d. Suffix

l address

a.j@dlchb.com

tion

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

S

[redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cleburne	TX	76033	Johnson	U.S.A.

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Lisa Lamond 6/13/2018

Please continue to next page

Chad Allen PRT 98157C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Jul 10, 2018 at 5:37 PM
To: LisaJ@dlchb.com
Cc: Stephanie Whitley <stephanie_whitley@fws.gov>

Received, thanks.

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. **We do not accept applications via fax or e-mail.***

***Sign up** for our e-newsletter to learn how we're working around the globe to protect species and their habitats!*

---------- Forwarded message ----------
From: **Lisa Jamnik** <LisaJ@dlchb.com>
Date: Tue, Jul 10, 2018 at 4:29 PM
Subject: [EXTERNAL] RE: Chad Allen PRT 98120 leopard & PRT 98157C
To: "anna_barry@fws.gov" <anna_barry@fws.gov>, "stephanie_whitley@fws.gov" <stephanie_whitley@fws.gov>

Oh ladies I am sorry please see the attached. Let me know if you need anything else. Thanks Lisa

****WE ARE MOVING PLEASE SEE OUR NEW OFFICE DETAILS***

D&L CHB, LLC

2015 S. ARLINGTON HEIGHTS, SUITE 123

ARLINGTON HEIGHTS, IL 60005

Telephone and fax numbers will remain the same

****PLEASE LIKE US ON FACEBOOK****

GO TO D&L CUSTOM HOUSE BROKERS

Thank You & Best Regards,

Lisa Jamnik

D&L CHB

T:847-690-0690

F:847-690-0699

C:262-949-1730

From: Lisa Jamnik
Sent: Tuesday, July 10, 2018 1:04 PM
To: anna_barry@fws.gov; stephanie_whitley@fws.gov
Subject: Chad Allen PRT 98120 leopard & PRT 98157C
Importance: High

Hi Stephanie & Anna

Sorry for all the confusion, Anna, Stephanie and I spoke on the phone please see the corrected date of birth, along with his passport – which I circled the date of birth – and an email we received giving us his date of birth. Anna, Stephanie said she would review with you because she check to find out what needed to be done. If you have any further questions please let me know. Thanks Lisa

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ARLINGTON HEIGHTS, IL 60005

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Thank You & Best Regards,

Lisa Jamnik

D&L CHB

T:847-690-0690

F:847-690-0699

C:262-949-1730

CHAD ALLEN.pdf
392K

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] Chad Allen PRT 98120 leopard & PRT 98157C

3 messages

Lisa Jamnik <LisaJ@dlchb.com> Tue, Jul 10, 2018 at 2:03 PM
To: "anna_barry@fws.gov" <anna_barry@fws.gov>, "stephanie_whitley@fws.gov" <stephanie_whitley@fws.gov>

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2015 S. ARLINGTON HEIGHTS, SUITE 123

ARLINGTON HEIGHTS, IL 60005

Telephone and fax numbers will remain the same

****PLEASE LIKE US ON FACEBOOK****

GO TO D&L CUSTOM HOUSE BROKERS

Thank You & Best Regards,

Lisa Jamnik

D&L CHB

T:847-690-0690

F:847-690-0699

C:262-949-1730

Whitley, Stephanie <stephanie_whitley@fws.gov> Tue, Jul 10, 2018 at 2:47 PM
To: Lisa Jamnik <LisaJ@dlchb.com>
Cc: "anna_barry@fws.gov" <anna_barry@fws.gov>

Lisa,

Were there supposed to be attachments?

Stephanie
[Quoted text hidden]
--

Stephanie Whitley
Legal Instrument Examiner
U.S. Fish & Wildlife Service - Headquarters
Attn Division of Management Authority - Branch Of Permits
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
703-358-1982 (Telephone)
703-358-2280 (Facsimile)
stephanie_whitley@fws.gov

www.fws.gov
www.cites.org

Interested in international conservation? Sign up for our e-newsletter! ***Sign up***

Lisa Jamnik <LisaJ@dlchb.com> Tue, Jul 10, 2018 at 4:29 PM
To: "anna_barry@fws.gov" <anna_barry@fws.gov>, "stephanie_whitley@fws.gov" <stephanie_whitley@fws.gov>

Oh ladies I am sorry please see the attached. Let me know if you need anything else. Thanks Lisa

**WE ARE MOVING PLEASE SEE OUR NEW OFFICE DETAILS*

D&L CHB, LLC

2015 S. ARLINGTON HEIGHTS, SUITE 123

ARLINGTON HEIGHTS, IL 60005

Telephone and fax numbers will remain the same

PLEASE LIKE US ON FACEBOOK

GO TO D&L CUSTOM HOUSE BROKERS

Thank You & Best Regards,

Lisa Jamnik

D&L CHB

T:847-690-0690

F:847-690-0699

C:262-949-1730

From: Lisa Jamnik
Sent: Tuesday, July 10, 2018 1:04 PM
To: anna_barry@fws.gov; stephanie_whitley@fws.gov
Subject: Chad Allen PRT 98120 leopard & PRT 98157C
Importance: High

[Quoted text hidden]

CHAD ALLEN.pdf
392K

Barry, Anna <anna_barry@fws.gov>

D & L Customs Brokers

1 message

Villavicencio, Jorge <jorge_villavicencio@fws.gov> Wed, Aug 1, 2018 at 10:33 AM
To: Ailteas Braxton <ailteas_braxton@fws.gov>, Luis Rivera <luis_rivera@fws.gov>, "MacDonald, Tim" <tim_macdonald@fws.gov>, Miguel Richardson/ARL/R9/FWS/DOI <Miguel_Richardson@fws.gov>, Rogelio Hubbard <rogelio_hubbard@fws.gov>, "Whitley, Stephanie" <stephanie_whitley@fws.gov>, "Williams, Robert" <robert_williams@fws.gov>, Caroline Harlow <caroline_harlow@fws.gov>, Kathleen Moore <kathleen_moore@fws.gov>, Anna Barry/ARL/R9/FWS/DOI <Anna_Barry@fws.gov>

Dear Team Mates:

D & L Customs House Brokers has moved and has a new address. There are several applications here that when the permit(s) is(are) issued must be mailed to D & L's new address. That new address is:

D&L CHB, LLC
2015 S. ARLINGTON HEIGHTS, SUITE 123
ARLINGTON HEIGHTS, IL 60005

The file numbers and person assigned the file(s) are:

98157C	AB
75906C	AB
80967C	MR
80975C	MR
11485C	MR
98158C	SDW
98120C	SDW
98119C	SDW
98118C	SDW
98117C	SDW
98115C	SDW
46993C	SDW
42537C	TM
80972C	RH
75883C	RW
75905C	RW
75904C	RW

A couple of these files show that they have been recently issued but not yet mailed.

Please make these changes to the application package that you are working on and add this e-mail to the administrative record of the file(s) assigned to you.

Respectfully,

George D. Villavicencio

George D. Villavicencio, J. D.
Supervisory Policy Specialist
U.S. Fish & Wildlife Service - Headquarters

Attn Division of Management Authority - Branch Of Permits
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
703-358-2483 (Telephone)
703-358-2280 (Facsimile)
Jorge_Villavicencio@fws.gov

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Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD NOV 21 2017

LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Asal	David	Mark	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Farmville	Virginia	23901	Cumberland	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA19855C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ertify that the information submitted in this application for a permit is complete and accurate to the ment herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

(No photocopied or stamped signatures) 11/14/2017 Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P.l. melanochaita African Lion

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zambia, Mafunta GMA, Western Province, S15'49028; E025'15474, Kaoma

   b. Date wildlife is to be hunted:

      06/01/2018-06/21/2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      Skull, Skin, Claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      N/A

   b. Date wildlife was hunted:

      N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	MVU Safaris
Business Name:	MVU Safaris
Address:	Plot # 6980 Katanga Road Lusaka
Address:	P.O. Box 35225 Lusaka
City:	Lusaka
State/Province:	Zambia
Country, Postal Code:	Zambia, 1010

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
David Asal (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.coml

I. DESCRIPTION OF COMPANY AND CONCESSION

Mvu Safaris Zambia Limited has been operating in Mufunta Concession since April 2011. The concession provides habitat for a range of species including Lion, Leopard, Antelopes, Hartebeest and Plains Game. The concession is on the Western boundary of the Kafue National Park. Mvu Safaris has entered into a ten year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system.

Our company is a Limited Company and maintains one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, eighteen anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous).Altogether our operations support 152 dependents in local Villages. These beneficiaries come from the local community.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal hunting activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from hunting of Lion and Leopard. With this in mind Mvu Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti –poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mvu Safaris maintains six groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the wildlife scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

In 2017, Mvu Safaris spent almost $28,000 in Mufunta on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 450 liters of diesel for patrol vehicles. We recorded 228 patrol days and well above 1600 patrol hours. We also made over $3000 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	$5900	Directly paid and some subsidies to WA
Scout equipment	$5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	$6300	For scouts and WA
Rations for WA and community scouts	$7800	
Rewards	$3000	For information and arrests
TOTAL	$28000	

The concession agreement has a clause which requires Mvu Safaris to submit annual reports on the anti-poaching activities and patrols done in each particular year to the wildlife authorities. This report will be taken into account in 2021 whether to renew the concession or not.

Bicycles and firearms recovered from poachers

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the Community Resource Boards (CRB) of about Forty Thousand Dollars ($40,000) annually as per agreement which was entered into in 2011 by Mvu Safaris, the Community and the Wildlife Authorities.

In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages.

In the pictue above members of the community waiting to receive Game meat which was legally hunted from Safari

B. Conflict Control

We have very few Human Animal Conflicts and in most cases they are not serious in nature.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans and boreholes which costs approximately Seventeen Thousand Five Hundred Dollars Only ($17500) to maintain annually respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource.

V. OTHER INFORMATION

A. Prey Base

Mvu Safaris in Mufunta is still monitoring the population growth of the Lion and Leopard which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mvu Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by positioning cameras in strategic areas so as to monitor the Activities of the Lion and Leopard. We will work extra hard to grow the population of the Species by at least 15% per year. This will be done by introducing a deliberate approach where only old animals will be harvested for trophies and work on very careful allocated quota utilization per year in the block.

We will also engage the wildlife authorities to regulate resident hunting by proposing that animals hunted for food purposes should be female so as to balance the Eco system. We further wish to propose that resident hunting should be closely monitored and supervised because we have had reports in the past where resident hunters would not conduct proper ethical hunting methods in the hunting concession where they get allocated hunting rights per year for their own personal hunting opportunities as residents of Zambia and we wish to bring this anomaly to an end.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lion in our area better. As at now we use Lion tracks and foot prints. Sightings by individuals and the cameras which we used this year to monitor the size and age for the Lion and keep records of the same.

C. Lion Aging Approach

Like other Safari Companies we have been following an age-based policy for African Lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities, and to be conservative in estimating age.

A number of potential Lion Trophy were not hunted this year because of our selectiveness.

Our approach as a company is to hunt lion which has reached an advanced and mature age only of minimum seven (7) years and above.

D. U.S. Hunters

Our largest clientele is from the United States of America (USA). We are happy to report that we have had very good relations with most of these clients who are willing to get out of their way and spend extra in terms of donations to communities and towards anti-poaching programs. Their approach to Safari Hunting has been that of maintaining high ethics of sustainability so as to improve the numbers of species in these concessions.

CONCLUSION

Mvu Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion/Leopard. Our program helps to preserve and improve available Lion/Leopard habitat. Our anti-poaching program serves to protect and grow the cats prey base and reduces incidental off take by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially Lion) to local communities' .Mvu Safaris has anti-poaching awareness campaign programs also which are done through funding sporting activities. This has helped improve the awareness on poaching in the community and how poaching robes them of the much needed finances generated from these natural resources. We can confirm that the communities in our concession are fully aware of the benefits that Safari Hunting comes along with and the dangers that are posed to this resource if poaching is left to escalate at higher levels. The community is now more than willing to bring to our attention any suspicious activities by some members of the communities.

Signed: _____

Operator Name: _____

Title: _____

mark asal

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Thursday, June 07, 2018 4:06 PM
To: (b) (6)
Subject: 63880C / Lion Trophy Import

Good morning Mr. Asal,

Ref: 63880C

Your referenced application request to import one male African lion trophy from MVU Safaris, Lusaka, Zambia, is under review. However, in order to complete processing your application, we need additional information. Therefore, please provide the following:

1. Provide documentation showing that the lion referenced in your application will be legally hunted within Mafunta GMA, Zambia.

2. Provide documentation that shows the age of the lion you are requesting to import.

3. If you are able to, please provide a signed copy of the MVU Safaris, LTD document enclosed in your application package.

In accordance with 50 CFR 13.11(e), if the requested information is not received by this office by July 22, 2018, (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

R
espectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up** for our e-newsletter to learn how we're working around the globe to protect species and their habitats!*

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4lA3WaTa8ljzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJqeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Mvu Safaris

Plot 2414,
Freedomway South-End
IDC Building
P.O Box: 35225,
Lusaka, Zambia
Tel/Fax: +26-01-232422
Mobile: 0977-431149

RCVD JUL 17 2018

4th July, 2018

The Director,
USFWS
United States of America

Dear Sir/Madam,

RE: AGE LIMIT FOR LIONS HUNTED IN ZAMBIA

We hereby wish to confirm that as per requirements by the Zambian government through the Department of National Parks and Wildlife Services, all Lions that are to be exported out of Zambia which were legally hunted are supposed to be five (5) years and above.

Any trophy that fails to meet this requirement is not permited to be exported and the Professional Hunter together with the Safari outfitter will be punished accordingly.

Please do not hesitate to contact the Wildlife Authorities in Zambia for any further clarifications.

Yours faithfully

MUHAMMAD SAEED ESSA
DIRECTOR

Original

NPW FORM 2

S/No. 0000270

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)
THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 30/05/18

DETAILS OF LICENSEE

Full Name: Asal David Mark. NRC No./Passport No.: (b) (6) [redacted]

Nationality: American Age:

Tel/Mobile No: E-mail:

Full Name of Safari Company: Mvn Safaris

Certificate of Incorporation No.: Date of Incorporation:

Postal Address: 35225 Lsk Residential Address:

Firearm Licence/Tourist Firearm Import No.: Calibre of Firearm:

Type of Hunt:

Any other relevant information, which may be considered in support of this application (e.g. previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Mufumbo	2018	4200
7			0048529		1

Total Animals fees paid - the kwacha equivalent of US$ 4200
Concession Fees paid - the kwacha equivalent of US$
Grand Total the kwacha equivalent of US$ 4200

Official Stamp

Chairperson of the Committee

CHILANGA, ZAMBIA.

Serial No. 555555

NPW FORM 5B

S/No.: .....

000541

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue: Chilanga Date of Issue: 30/05/18

DETAILS OF PERMIT HOLDER

Full name: Asal David Mark NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No.: ..... E-mail address: .....

Postal Address: MVH Safaris Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 791 2. ..... 3. .....

Calibre(s) 1.: 360 2. 375 3. .....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No: 000787

Hunting Type: Non Resident

is hereby authorised to hunt in Lunsemfwa Mufunta Game Management Area,

Mwanya Mufunta hunting block for ..... days from 31/05/18

to 21/06/2018 (Dates inclusive)

Amount Paid: $ 150 — GRZ Receipt No: GS 43529

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
30 MAY 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

Mvu Safaris

Plot 2414,
Freedomway South-End
IDC Building
P.O Box: 35225,
Lusaka, Zambia
Tel/Fax: +26-01-232422
Mobile: 0977-431149

MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.coml

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Mvu Safaris
Zambia LTD
PLOT 2414
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IDC BUILDING
P.O. BOX 35225, LUSAKA-ZAMBIA
TEL/FAX: +260 211 232422
MOBILE: 0977 431149

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Signed: _____

Operator Name: GULLAM PATEL

Title: DIRECTOR

Mvu Safaris Zambia LTD
PLOT 2414
FREEDOMWAY SOUTH-END
IDC BUILDING
P.O. BOX 35225, LUSAKA-ZAMBIA
TEL/FAX: +260 211 232422
MOBILE: 0977 431149

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-63880C

Enhancement Finding
Applicant: David Mark Asal (PRT-63880C)

David Mark Asal submitted an application on November 21, 2017, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken June 1, 2018, through June 21, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Asal's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Mafunta GMA, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Asal's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Asal's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Asal's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Asal's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Asal will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Asal, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. David Asal.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to David Asal.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Chief 6/8/18
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA63880C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

DAVID MARK ASAL
(b) (6) [redacted]
FARMVILLE, VA 23901
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 1 3 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Ellington	Scott	Byron	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6) [redacted] no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dallas	TX	75201	Dallas	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
N/A	N/A	N/A	N/A	N/A

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. [redacted] miliar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ***of Title 50***, and I certify that the information submitted in this application for a permit is complete and [redacted] erstand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

8/1/2019

Signatu[redacted] ocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Scott Ellington
(b) (6) Dallas, TX 75201

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Sarah Bell Goldsmith
(b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo. (Pardus. Member of the Felidae) African Lion.

b. Sex (if known). Male as females are Not allowed to be harvested in Tanzania

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

N/A

b. Date wildlife is to be hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Tanzania. (Area: KIZIGO GAME RESERVE; Region: SINGIDA; GPS: S06.47'67.4", E 034.33'58.1"; Hunting Block: KIZIGO GAME RESERVE CENTRAL; Nearest City: SINGIDA)

b. Date wildlife was hunted:

10/10/2017 (October 10, 2017)

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Safari Company: PALAHALA SAFARIS & HUNTING LTD; BLOCK DD, PLOT # 191; NAIROBI ROAD, SAKINA AREA; ARUSHA-TANZANIA

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Tanzania Big Game Safaris Ltd and Affiliates
Block DD /Plot 191, Nairobi Road/Sakina Area, Arusha, Tanzania

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
Attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Mr. Webby Kapaliswa
Business Name:	Tanzania Big Game Safaris, Ltd/
Address:	Block DD /Plot 191
City:	Nairobi Road/Sakina Area
State/Province:	Arusha, Tanzania
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application. Addtl. info attached

a. Do you have any information regarding the population status or trend data on the species hunted?

Over the last few seasons, the outfitters have obtained conclusive data that shows a more than thriving population in the majority of our hunting areas. Population is very healthy and on the increase

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Tanzania Big Game Safaris and affiliates are associated with an NGO that is called Conservation Foundation Tanzania. Work hand in hand with neighboring villages that are adjacent to the concession areas by educating villagers, building schools, health care needs, finding jobs, etc.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

Tanzania Big Game Safaris has been operating since 1988. The managing director has always been extremely active in Wildlife Conservation. He employs over 5 active anti-poaching teams with over 50 anti-poaching officers that protect a single area. He limits harvesting to male lions over the age of 8

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two l

Applicant's signatu [redacted] (b) (6) _____ Date: 8/1/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Department of Interior
US Fish & Wildlife Service

Federal Fish and Wildlife Permit Application Form
Form 3-200-20

Mr. Scott Byron Ellington

9. Additional information provided below:

The affiliate companies along with Tanzania Big Game Safaris are all under one-management agreement with Tanzania Big Game Safaris.

Tanzania Big Game Safaris has been operating in Tanzania since 1988. Since its inception, the founder and managing director is Raoul Ramoni. Raoul has always been extremely active in Wildlife Conservation. He has always been a true custodian of the land and wildlife. In addition, he has a very strong and active anti-poaching team working throughout the year in each of the concession areas. In some cases, depending on the size of the area he is managing, he employs over five active anti-poaching teams with over 50 anti-poaching officers that are protecting a single area. They protect this particular area from illegal poachers, woodcutters, illegal miners, illegal fishermen, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserves. Due to the very stringent wildlife management program, these areas under his management have a very healthy and sustainable game population. Amongst the game found in these areas, there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been properly managing the areas. Thus, this dramatically limits the harvesting of male lion to only an older more mature male typically over the age of eight years and that is no longer a residing pride member.

Tanzania Big Game Safari's policy targets old lone (Nomad) males that no longer breed and are not associated with any prides with females and/or cubs. The lions that they have harvested in the past have all past the aging process in Tanzania, since its inception.

The numbers of lions that are visible on a normal safari are very impressive. Quite often on a 21 days safari, everyone involved will have the pleasure of sighting between 20 and 35 male lions. Over the last few seasons, they have obtained conclusive data that shows a more than thriving population in the majority of their hunting areas, with the exception of Masailand. Subsequently, the lion populations, due to this very strict management practice, are very healthy and there are a significant amount of lions on the increase. Tanzania is fortunate enough to have the highest density of lion population in Africa. Since 2012, Tanzania put in place a law that would only allow lions over 6 years of age to be hunted. It has been a common practice for our Companies for the last 15 years, not to harvest any males that are younger than 7 years of age.

Tanzania Big Game Safaris and affiliates are associated with an NGO (non governmental organization) that is called Conservation Foundation Tanzania. This has been very active in Tanzania (in many different capacities) since 1994. It is fortunate to be able to work hand in hand with neighboring villages that are adjacent to the concession areas. Educating villagers neighboring these concession areas is a huge advantage in protecting the wildlife living within these eco-systems. Local people are taught that they have the opportunity of finding available jobs with the hunting outfitter whom is managing the concession areas. In addition, the outfitter is able to help the villages with different community projects based on their needs such as building schools for the different ages of the children irrespective of their religion. Another example is the possibility of health care needs such as wheel chairs and medical supplies. School supplies and awareness of potential sponsors for individual students to be able to continue to further education are just a few examples of the benefits

O.A-7418-M

September 26, 2017 12:18:28 pm

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

Safari Date: Sunday, September 24, 2017

Permit Return Date: Saturday, November 4, 2017

ADDITIONAL INTER-COMPANY HUNTING PERMIT PERMIT NO **8885031** MAIN PERMINT NO. **2008225**

Station ARUSHA Date of Issue 23-September-2017 Date of Expiry 14-October-2017 Package Type 21 DAYS

This RESIDENT'S / VISITOR'S Permit is Granted to SCOTT BYRON ELLINGTON of Address NO MATCH

Who holds Weapon (Type) RIFLES Calibre .375/.458/.3(Maker's Number D90149/B33750(C.A.R Number -

Licence Number 009027 Dated 12-Sep-17 Issued At ARUSHA Weapon owner & Address SCOTT BYRON ELLINGTON

and entitles him to hunt the below animals in the (Game area and blocks) KIZIGO GR C

owned by PALAHALA SAFARIS AND HUNTING LTD

Parent Company: MUHESI SAFARIS LTD

PH MR. WEBBY KAPALISWA,

Signature of Holder

Signature of Issuing Officer & Official Stamp

THE DIRECTOR OF WILDLIFE
26 SEP 2017
ISSUED AT ARUSHA

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
BABOON YELLOW	2	
BUFFALO AFRICAN CAPE	3	
BUSHBUCK CHOBE	1	
BUSHPIG	1	
CIVET AFRICAN	1	
DIKDIK KIRK'S	1	
DUIKER COMMON	1	
DUIKER HARVEY'S RED	1	
ELAND LIVINGSTONES	1	
HARTEBEEST LICHTEINSTEIN'S	2	
HYAENA SPOTTED	1	
IMPALA SOUTHERN	2	
JACKAL SIDE STRIPED	1	
KLIPSPRINGER	1	
KUDU GREATER	1	
LEOPARD	1	
LION	1	
ORIBI COMMON	2	
RATEL (HONEY BADGER)	1	
ROAN ANTELOPE	1	
SABLE ANTELOPE ROOSEVELT	1	
SERVAL CAT	1	
STEINBUCK	1	
WARTHOG	2	
WATERBUCK DEFASSA	2	
ZEBRA BURCHELL'S	2	

NOTE

1. This permit permit must be surrendered to a Licensing Officer of the Game Division or Managing Director within 15 days of its expiry or immediately the Professional hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on the business of a Trophy dealer .
3. The maximum number of animals must not be exceeded without the written authority of the Director of Game
4. The Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer or sell.
5. A Professional Hunter conducting a safari must get a guide or letter of authority to go out alone from the Regional Game Officer
6. For weapon indicate the heaviest rifle in the case of big game or shortgun in the case of birds.
7. **The client SHOULD NOT exceed the number and species specified in the given Safari Package. Anything contrary is an offence under Section 47(b) (ii) of Wildlife Conservation Act 2009**

GAME KILLED (INTER-COMPANY)

WILDLIFE DIVISION

MINISTRY OF NATURAL RESOURCES AND TOURISM

September 21, 2017 5:40:30 pm

PERMINT NO. 8885031

PARENT COMPANY MUHESI SAFARIS LTD

2008225

PH NAME MR. WEBBY KAPALISWA,

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

CHILD COMPANY PALAHALA SAFARIS AND HUNTING LTD

GAME AREA KIZIGO GR C

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
JWIKOR COMMON	ONE	KIZIGO CENTRAL	.300	1/10/17	17.47	M	S06.58308 E034.55502		3½"
ELAND.	ONE	KIZIGO CENTRAL	.375.	2/10/17	12.36	M	S06. 46027 E034. 75365		34"
SABLE	ONE	KIZIGO CENTRAL	.300	7/10/17	14.47	M	S06. 39050 E034. 52169		38½"
LION.	ONE	KIZIGO CENTRAL	.375	10/10/17	06.35	M	S06. 47647 E034. 33581		SKULL 23½"
KLIPSPRINGER	ONE	KIZIGO CENTRAL	.300	11/10/17	15.12	M	S06. 39985 E034. 36687		3½"
IMPALA.	ONE	KIZIGO CENTRAL	.300	13/10/17	09.10	M	S06. 5[illegible] E034. 35305		22"
GREATER KUDU	ONE	KIZIGO CENTRAL	.375	13/10/17	12.14	M	S06. 57496 E034. 30485		52"

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

DIRECTOR OF WILDLIFE
SEP 2017
ISSUED AT ARUSHA

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunting permit.

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

For. PROJECT MANAGER
RUNGWA/KIZIGO/MUHESI
P.O.BOX128 MANYONI
13.10.2017

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Import Application #02691D

1 message

Harcum, Heather <heather_harcum@fws.gov> Mon, Sep 9, 2019 at 11:04 AM
To: (b) (6)

Good morning Sarah,

I am reaching out in regards to Mr. Scott Ellington's application to import an African lion trophy (*Panthera leo melanochaita*) with Mr. Webby Kapaliswa of Palahala Safaris & Hunting Ltd. from the Kizigo Game Reserve in Tanzania, Block DD/Plot 191. This application was received on August 9, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. As such could you please respond to the following:

1. Confirm Mr. Ellington's physical address (currently we have 2525 N. Pearl St. #1202, Dallas, TX 75201).

2. An operator report from Palahala Safaris & Hunting Ltd. or its parent company which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Information about the safari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anit-poaching activities and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,

Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Import Application #02691D

Sarah Goldsmith (b) (6) Mon, Sep 9, 2019 at 3:01 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>

Please see answers below in red

Sarah Bell Goldsmith

(b) (6)

From: Harcum, Heather [mailto:heather_harcum@fws.gov]
Sent: Monday, September 9, 2019 10:05 AM
To: Sarah Goldsmith (b)(6)
Subject: USFWS ESA Lion Trophy Import Applicaon #02691D

Good morning Sarah,

I am reaching out in regards to Mr. Scott Ellington's application to import an African lion trophy (*Panthera leo melanochaita*) with Mr. Webby Kapaliswa of Palahala Safaris & Hunting Ltd. from the Kizigo Game Reserve in Tanzania, Block DD/Plot 191. This application was received on August 9, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. As such could you please respond to the following:

1. Confirm Mr. Ellington's physical address (currently we have (b) (6) , Dallas, TX 75201).

Correct. Mr. Scott Ellington's physical address is currently (b) (6) *, Dallas TX 75201*

2. An operator report from Palahala Safaris & Hunting Ltd. or its parent company which includes, but is not limited to-

- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)

- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees

- Information about the safari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anit-poaching activities and success in those

efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

A ached

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,

Heather Harcum

--

Heather Harcum | Permits Biologist

USFWS | International Affairs

5275 Leesburg Pike, MS: IA

Falls Church, Virginia, 22041-3803, USA

Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

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Tanzania Operator Report.pdf
310K

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Operator Report

Tanzania Big Game Safaris Ltd
Tanzania Safaris and Hunting (2003) Ltd
Tanzania Wildlife Company Ltd
Wild Foot Prints Ltd

CONTACT INFORMATION

Postal address:
PO Box 2458
Arusha, Tanzania
Africa

Physical address:
Block DD /Plot 191
Nairobi Road/Sakina Area
Arusha, Tanzania

Telephone: +255-789-193-908
Telefax: +255-732-979-501

email: tbgs@tbgs.co.tz
tbgs01@yahoo.com

After Hours Emergency Contact Information

Khadija Mwilima 011-255-752-859-518

U.S. Embassy – Tanzania
P. O. Box 9123, 686 Old Bagamoyo Road, Msasani, Dar es Salaam, Tanzania
Telephone: +255 22 2668001 – Fax: +255 22 2668238

TANZANIA BIG GAME SAFARIS "And affiliates"

About Tanzania Big Game Safaris

The affiliate companies along with Tanzania Big Game Safaris are all under one-management agreement with Tanzania Big Game Safaris.

Tanzania Big Game Safaris has been operating in Tanzania since 1988. Since its inception, the founder and managing director is Raoul Ramoni.

Raoul has always been extremely active in Wildlife Conservation. He has always been a true custodian of the land and wildlife.

In addition, he has a very strong and active anti-poaching team working throughout the year in each of the concession areas.

In some cases, depending on the size of the area he is managing, he employs over five active anti-poaching teams with over 50 anti-poaching officers that are protecting a single area. They protect this particular area from illegal poachers, woodcutters, illegal miners, illegal fisherman, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserves. Due to the very stringent wildlife management program, these areas under his management have a very healthy and sustainable game population. Amongst the game found in these areas, there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been able to properly manage the areas. Thus, this dramatically limits the harvesting of male lion to only an older more mature male typically over the age of eight years and that is no longer a residing pride member.

Our policy targets old lone (Nomad) males that no longer breed and are not associated with any prides with females and/or cubs.

The lions that we have harvested in the past have all past the aging process in Tanzania, since its inception.

The numbers of lions that are visible on a normal safari are very impressive. Quite often on a 21 days safari, everyone involved will have the pleasure of sighting between 20 and 35 male lions.

Over the last few seasons, we have obtained conclusive data that shows a more than thriving population in the majority of our hunting areas, with the exception of Masailand.

Subsequently, the lion populations, due to this very strict management practice, are very healthy and there are a significant number of lions on the increase. A new challenge that is arising is that there are lions very often venturing into the neighboring villages and end up eating either livestock, dogs and in many cases also humans due to the increase in their numbers.

It has been a common practice for our Companies for the last 15 years, not to harvest any males that are any younger than 7 years.

Tanzania is fortunate enough to have the highest density of lion population in Africa.

Since 2012, Tanzania put in place a law that would only allow lions that were over 6 years of age to be hunted.

Tanzania Big Game Safaris and affiliates are associated with an NGO (non governmental organization) that is called Conservation Foundation Tanzania. This has been very active in Tanzania (in many different capacities) since 1994. It is fortunate to be able to work hand in hand with neighboring villages that are adjacent to the concession areas. Educating villagers neighboring these concession areas is a huge advantage in protecting the wildlife living within these eco-systems. Local people are taught that they have the opportunity of finding available jobs with the hunting outfitter whom is managing the concession areas. In addition, the outfitter is able to help the villages with different community projects based on their needs such as building schools for the different ages of the children irrespective of their religion.

Another example is the possibility of health care needs such as wheel chairs and medical supplies.

School supplies and awareness of potential sponsors for individual students to be able to continue to further education are just a few examples of the benefits

TANZANIA BIG GAME SAFARI

Harcum, Heather <heather_harcum@fws.gov>

Operator Enhancement Report for 2016 to Current

1 message

Harcum, Heather <heather_harcum@fws.gov> Wed, Sep 11, 2019 at 3:55 PM
To: tbgs@tbgs.co.tz

Good afternoon,

I am a representative of the United States Fish and Wildlife Service (USFWS), reviewing several import permit applications for lion trophies hunted in Tanzania through Tanzania Big Game Safaris.

We would like receive the most updated information about the operators the importers hunted with. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings.

We currently have your (quite commendable) operator enhancement report from 2013-2015, but would like the most updated information pertaining to allocation of funds, population status, among other additional information about your concession.

Warmly,
--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
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RENEE SNIDER

October 18, 2019

RCVD OCT 30 2019

Department of the Interior
U.S. Fish and Wildlife Service
Chief Maria Cogliano
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: SUPPLEMENT APPLICATION TO IMPORT SPORT HUNTED TROPHY
PRT: MA02691D-0
APPLICANT NAME: Scott Byron Ellington

Dear Chief Cogliano:

Enclosed please find Notice of Representation written on behalf of Conservation Force regarding the above captioned application.

COUNTRY:	Tanzania
SPECIE:	African Lion
DATE OF HUNT:	October 10, 2017
OPERATOR:	Palahala Safaris & Hunting Ltd.

If you have any questions about this Import Application, please do not hesitate to contact us.

Sincerely,

John J. Jackson, III

JJJ/ecs

Enclosure:
a. Notice of Representation

3240 S I-10 Service Road W, Suite 200 • Metairie, Louisiana 70001 • USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a permit to import a threatened-listed PANTHERA LEO MELANOCHAITA [AFRICAN LION] trophy from TANZANIA.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

Signed: (b)(6)

Name: SCOTT BYRON ELLINGTON

Date: October 17, 2019

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-02691D

Enhancement Finding
Applicant: Scott B. Ellington

I. Summary:

Mr. Ellington submitted an application on August 13, 2016, for the importation of one male African lion (*Panthera leo melanochaita*) from Tanzania for the purpose of enhancing the propagation or survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion from Tanzania requires prior issuance of a CITES export permit from the CITES Management Authority of Tanzania, and import into the United States requires prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Tanzania, and other information available to the Service, the Service has determined that the importation of the sport-hunted trophy taken by Mr. Ellington on October 10, 2017, from the Kizigo Game Reserve in the Singida Region of central Tanzania **meets** the enhancement criteria under 50 CFR 17.32.

The Service recognizes that legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. We consider whether the management program is actively addressing the current and longer term threats to the subspecies based on sound scientific principles. A management program for a species such as *P. l. melanochaita* is expected to address, at a minimum, an evaluation of population trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating whether the importation of Mr. Ellington's trophy of *P. l. melanochaita* would be authorized in accordance with our permit issuance criteria, we were particularly interested in examining how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We evaluated how, and how well, the hunting component of the management program addresses these threats by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. We also considered how the participation of a U.S. hunter, in this case, Mr. Ellington, contributes to the overall management of lions within a country.

We work closely with the range countries and interested parties to obtain relevant information. The government of Tanzania has provided a series of documents, including Tanzania's

"enhancement"[1] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Ellington's application, the Tanzania Wildlife Research Institute (TAWIRI), open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

II. U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule that, effective January 22, 2016, listed the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act (USFWS 2015; 80 Fed. Reg. 79999); this species is regulated under a species-specific 4(d) rule of the Act, which is set forth at 50 CFR17.40(r).

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the rule contains the applicable prohibitions and exceptions for the specific species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita* (50 CFR 17.40(r)), all of the prohibitions of 50 CFR 17.31 and permit provisions of 50 CFR 17.32 apply. The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of a commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out these otherwise prohibited activities, including importation, under certain circumstances (e.g., scientific purposes or activities that enhance the propagation or survival of the species), in accordance with the Service's regulations at 50 CFR 17.32. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild (USFWS 2015; 80 Fed. Reg. 79999); 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the issuance criteria under 50 CFR 17.32. However, in some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has made the required enhancement finding based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

[1] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

A. General ESA permitting requirements

As we explained when finalizing the 4(d) rule, our threatened species permitting regulations provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the population in the country where the specimen originated and whether that management of the population addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Tanzania contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of Tanzania's lion management plan provides a net benefit to the subspecies and its ecosystem. For example, several components of a management plan by which trophy imports could meet the issuance criteria might be government incentives in place that lead to increased habitat protection for lions by private landowners and communities, and incentives provided to local communities that lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions.

The Service evaluates an application involving a *P. l. melanochaita* sport-hunted trophy in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b), the following:

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

B. IUCN guiding principles

In addition to these factors, specifically in relation to sport-hunting, in the 4(d) rulemaking for *P.l. melanochaita*, the Service explained it considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P.l. melanochaita*. The Service has, therefore, considered these principles in conjunction with our threatened species issuance criteria in making our determination of enhancement concerning import of the sport-hunted *P. l. melanochaita* trophy that is the subject of this permit application. The IUCN document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources". It recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and, more specifically, the conservation of the hunted species.(IUCN SSC, 2012)

The IUCN document lays out the following five guiding principles:

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure

that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to developing enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the ESA. Before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

III. Basis for Finding:

As explained above, any person wishing to conduct an otherwise prohibited activity, including import of *P. l. melanochaita* specimens, must first obtain a permit as required by 50 CFR 17.32; issuance of an import permit for a sport-hunted trophy of *P. l. melanochaita* requires an enhancement finding.

The Service has made the required enhancement finding for this import permit based on this individual application to import a sport-hunted trophy of *P. l. melanochaita* taken in Tanzania. Additionally, as detailed below, relevant information obtained for Tanzania as a whole, has been considered. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"[2] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Ellington's application, the TAWIRI, open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

On April 14, 2016, the Service sent a letter to Mr. Herman Keraryo, Acting Director of Wildlife for the Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT), with a list

[2] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

of questions that would aid the Service in evaluating the overall conservation and management of the lion population in Tanzania, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to our April 14, 2016 letter, the MNRT provided a series of documents, including Tanzania's "enhancement" and non-detriment finding for lions.

Upon invitation, a U.S. delegation of Service personnel visited Tanzania in November 2018 to observe the challenges and successes of conserving wildlife, including lions, in Tanzania. This trip allowed first-hand exposure to the on-the-ground implementation of policies and procedures the government has put into place to conserve lions. Detailed discussions with government officials, national experts, land managers, game officers, village leaders, and leaders in the hunting industry, as well as site visits to different models of hunting operations, served to both substantiate and elucidate information provided in documents. We determined that the status of lions and the management approach of Tanzania are substantially as presented, conferring confidence to the conclusions drawn from information provided.

IV. Governance of Wildlife in Tanzania:

In Tanzania, wildlife resources, such as lions, are protected under several Acts of Parliament, establishing the authority for all aspects of wildlife management, including law enforcement activities. The **Wildlife Conservation Act** (WCA) of 2009, which replaced the original WCA of 1974, provides the legal framework for operation of the Wildlife Division under the MNRT, including the appointment of the Director of Wildlife. The WCA provides for the establishment of a Wildlife Protection Unit granted paramilitary status to protect wildlife against unlawful utilization, and a Wildlife Authority to manage all Tanzania wildlife located outside the boundaries of the National Parks and the Ngorongoro Conservation Area. The Wildlife Authority is also responsible for meeting international obligations involving wildlife conservation. The WCA ensures the protection of natural habitat and wildlife through the establishment of a network of Protected Areas (PAs), e.g., Game Reserves, Game Controlled Areas, Wildlife Management Areas, and areas such as wildlife corridors. The **National Parks Act** (CAP 282 R.E. 2002) establishes the legal authority for the creation and management of national parks, granting powers to the Director to enable maintenance and security within national parks, as well as the responsibility for the protection of their wildlife resources. The **Ngorongoro Conservation Act** (CAP 284 R.E. 2002) provides the legal framework for the existence of the multiple land use in the Ngorongoro Conservation Area, its Management Authority under the direction of the Conservator, and the authority for its maintenance and security. The **TAWIRI Act** (CAP 260 R.E. 2002) grants powers to the Director who is responsible for research involving wildlife, and for providing this information to the Wildlife Authorities.

The responsibility for managing Tanzania's wildlife currently falls primarily under four institutions. The **Tanzania Wildlife Research Institute** (TAWIRI) is responsible for conducting and coordinating wildlife research in Tanzania. It functions as the scientific authority for wildlife conservation and management, and the CITES Scientific Authority for Tanzania. The **Tanzania National Parks Authority** (TANAPA) is responsible for managing 15 National Parks with a

total area of 50,872 sq.km. In the national parks, only non-consumptive utilization (tourism game viewing) of wildlife resources is allowed. **Ngorongoro Conservation Area Authority** (NCAA) is responsible for management of only one area, the Ngorongoro Conservation Area, a protected area of 8,300 km^2. It is the only multiple land use wildlife area in Tanzania in which the consumptive utilization of wildlife is not permitted. Both TANAPA and NCAA are parastatal – public organizations, but not directly run by the government; all revenue is kept by the organizations for use in management of these areas.

The Wildlife Division has historically been responsible for the country's wildlife resources located outside the jurisdiction of the Ngorongoro Conservation Area and Tanzania National Parks. However, in response to concerns over questionable management practices and lack of adequate funding for the Wildlife Division to successfully manage wildlife resources, the **Tanzania Wildlife Management Authority** (TAWA) was established in 2014[3]. Also a parastatal organization, TAWA operates with significant autonomy and retains all revenue generated from hunting[4]. TAWA became operational in July 2016, and has since established an aggressive, proactive approach to protecting wildlife. In addition to conducting routine anti-poaching patrols, TAWA is actively building capacity with technology (e.g., GIS), relationships with local communities (e.g., intelligence-led operations), and collaborative efforts on an international scale.

TAWA is responsible for the management of 28 Game Reserves with an area of 112,564 km^2, approximately 38 Game Controlled Areas covering about 161,521 km^2, and Ramsar sites covering 249,856 km^2. There are also District Councils, local government institutions that work in collaboration with the TAWA. These councils oversee wildlife conservation issues and facilitate the establishment and management of Wildlife Management Areas (WMAs) on village lands.

WMAs were established as a new category of wildlife conservation areas consisting of settled and unsettled lands outside PAs, with the goal of allowing for rural communities and private landholders to manage wildlife on their land for their own benefit, shifting wildlife such as lions from a liability to an asset. The framework for WMAs was outlined in Tanzania's Wildlife Policy of 1998 (revised in 2007), with legislation established under the Wildlife Management Areas Regulations of 2002, authorizing the formal establishment of WMAs. From 2010 to 2014, over 1.3 million USD from hunting fees were disbursed to WMAs (TAWA, 2016). In 2012, Tanzania amended its Wildlife Management Area Regulations to provide a new basis for strengthening the links between local communities and wildlife management by addressing the issues of benefit sharing and control over concession allocations. Under the new regulations, the WMAs receive approximately 60-65% of the total hunting revenue occurring within the block. Additionally, WMAs gained the power to sign utilization contracts with the private sector, enabling seven WMAs to sign contracts with hunting operations worth more than 4.3 million USD (TAWA, 2016). The establishment of these WMAs has resulted in an additional 23,700 km^2 of Tanzania's land area being added to its conservation network and increased capacity for protected area management through the training of village game scouts and WMA managers.

The tourism industry, largely wildlife-based, contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates

[3] Prior to the establishment of TAWA, funding to the Wildlife Division was paid by the central treasury; inadequate funding left the Wildlife Division unable to effectively manage and protect Tanzania's wildlife resources.
[4] The mandate to collect and retain revenue from trophy hunting is enshrined in "The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order 2014.

almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations. The three parastatal organizations, TANAPA, NCAA and TAWA, retain 100% of their revenue share. Both TANAPA and NCAA are generally self-sustaining; consequently, National Parks and equivalent areas such as Ngorongoro Conservation Area, with an area covering approximately 38% of all PAs in Tanzania, are adequately funded. The sustainable utilization of resources (i.e., hunting) accounts for 70% of TAWA revenue; therefore, the viability of TAWA will depend, in part, on sufficient revenue from safari hunting. In 2012/2013, the Government of Tanzania re-established the Selous Game Reserve Revenue Retention Scheme, whereby 50% of the revenue generated from photographic tourism and tourist safari hunting is retained in order to meet management and enforcement costs in the Selous Game Reserve, one of the largest protected areas in Africa. Again, the viability of the Selous will depend, in part, on sufficient revenue from safari hunting.

Tanazania is a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Tanzania provided a copy of their CITES non-detriment finding (NDF) for lions, which finds that the export of the species will not be detrimental to the survival of the species in the wild.

Tanzania is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. As required of a member state, Tanzania has established management programs for the conservation and sustainable use of wildlife.

V. Status of Lions in Tanzania:

Approximately 40% of all lions in Africa are found in Tanzania (Riggio et al., 2013). The lion range in Tanzania covers over 90% of land (Mesochina et al., 2010), with four main subpopulations:

1. the Maasailand Ecosystem, which encompasses the Mara, Arusha Kilimanjaro and Manyara Regions of northeastern Tanzania;
2. the Kagera and Kigoma Regions of northwestern Tanzania;
3. the Rukwa, Tabora and Mbeya Regions of central and western Tanzania;
4. Selous Ecosystem, which encompasses the Lindi, Morogoro and Ruvuma Regions of southern Tanzania.

TAWIRI presents Tanzania's latest lion population estimates as 16,800 individuals (Mesochina et al., 2010), and 17,564 (12,208-19,320) (Ikanda & Packer, 2006). They estimate that 13,600 (or 81%) of these lions occurred within PAs and approximately 3,200 (or 19%) individuals occurred outside PAs. According to Riggio et al. (2013) and Björklund (2003), the minimum number of lions estimated to categorize an area as a lion stronghold is 500 individuals. The estimated population size of the four main lion ecosystems was 3,700 in the Maasailand Ecosystem, 520 in Kagera and Kigoma Regions, 2,300 in Rukwa, Tabora and Mbeya Regions, and 7,200 in the Selous Ecosystem.

Trend analysis of the lion population in Tanzania is limited due to the sporadic nature and variable methodology of past surveys, as well as the difficulty of obtaining precise lion counts (Brink, Smith, & Skinner, 2013; Funston et al., 2010), but it is suggested that, nationally, far fewer lions exist today than did 50 years ago (Ikanda, 2008). Available information suggests that this may be spatially variable, e.g., declining populations in Katavi and Tarangire (Bauer et al., 2015) and stable populations in the Selous Game Reserve (Packer et al., 2011).

VI. Management of Tanzania's Lion Population

In recognition of the role that Tanzania plays in the conservation of this species, a workshop was held in 2006 to assess available information and to set priorities for conservation of the lion in Tanzania. The Tanzania Lion and Leopard Conservation Action Plan (TAWIRI, 2009) provided an overview of this workshop and outlined a national strategic plan for lion conservation. Habitat loss and increased conflict with humans had been identified as the major threat to the species. The Tanzania Lion and Leopard Conservation Action Plan (Plan) concluded that, for those lion populations existing outside National Parks, well-run trophy hunting programs could be leveraged to successfully manage and conserve lions against these threats. To that point, the majority of permanent lion range in Tanzania lies within protected areas, 61% of which are designated as hunting areas (Mesochina et al., 2010).

A. Hunting:

Hunting of lions is allowed across much of Tanzania. Safari hunting occurs in areas known as hunting blocks, designated in Game Reserves, Game Controlled Areas, Open Areas, Forest Reserves and WMAs. Until recently, blocks were allocated using an administrative process. The government would invite hunting companies to apply to operate a hunting block; interested hunting companies were evaluated by the Hunting Block Advisory Committee. Hunting companies were allocated blocks for a period of five years, with a reporting requirement on the third year to determine compliance under the terms outlined within the hunting block regulations (TAWA, 2016). However, in 2017, it was announced that the block allocation process would be amended to introduce an auction system.

Wildlife hunting in Tanzania is based on hunting regulations set forth in Tourist Hunting Regulations No. 306 (2002). The regulations specify the fees for hunting different species, and further specify a minimum number of hunting days. Hunters are required to purchase a minimum 21-day safari in order to request a permit for the harvest of lions, as well as other specified animals (e.g., elephant, leopard). Hunters must pay a number of different fees for permits and licenses to be granted harvest authorization. The game fee to hunt a lion is the second highest game fee in Tanzania, second only to elephants.

A quota system historically was the primary method of regulating trophy hunting in Tanzania. Annual harvest quotas have been lowered over the past decade, from 520 in 2008-2009 (Lindsey et al., 2013) to 315 in recent years (TAWA, 2016). In 2016, the annual quota was further reduced to 200 individuals (TAWA, 2016). An annual quota of 200 individuals is well within the suggested sustainable 1 lion/2000 km^2 harvest rate identified by Packer et al. (Packer et al., 2011), and 25% below the sustainable harvest level suggested by TAWIRI (TAWA, 2016). However, the Plan noted the lack of scientific justification underlying that system. Furthermore, a quota system is reliant on

accurate population estimates, a near impossibility with lions. A model that simulated the dynamics of populations as a function of both quota size and age at harvest showed that there is almost no negative affect on population size when hunting is restricted to males six years or older (Whitman, Starfield, Quadling, & Packer, 2007). Restricting lion hunting by age would reduce the reliance on population estimates – an intensive and expensive effort that does not reliably return accurate results – while minimizing the effect on a lion population. Tanzania was the first country in African lion range states to officially establish age restriction rules, prohibiting hunting lions of an age below six years (section 27(1) of the Tourist Hunting Regulations of 2015). Violations of this regulation can result in penalties for the professional hunter guiding the offending hunter, including fees and revoking of the professional hunter's license.

Although inspection of trophies are required prior to export, the fundamental difficulties of accurately estimating lion age, as well as a disregard for these regulations, can result in the take of lions younger than six years. Tanzania has consequently maintained a quota system, set by hunting block according to the lions harvested during the previous hunting season. If a trophy lion is estimated to be 4-6 years, the hunter/client may export that lion, but the quota for the hunting block where the trophy was taken is reduced for the following hunting season. If a trophy is taken below the age of 4, there is a reduction of the hunting block's quota of harvestable lions by 2 and potential cancellation of the hunter's license along with other penalties such as the trophy not being eligible for export. If the trophy meets the criteria of 6 years of age or older, the hunting block's quota remains unchanged for the following hunting season. According to MNRT, these regulations have been in place since the 2012/2013 hunting season. For each trophy harvested, a compulsory hunter evaluation form, photos along with presentation of lion skull to officials for inspection and measurements, including tooth x-rays, are necessary prior to the issuance of an export permit (MNRT, 2015; TAWA, 2016).

B. Human-Lion Conflict:

It is difficult to estimate how many lions are killed illegally each year; however, retaliatory killings may be as high as 200 individuals annually (TAWA, 2016). Lions are provided protection from illegal or retaliatory killing under the Fourth Schedule due in part to human/livestock-conflict under the Dangerous Animals Damage Consolation (Government Notice No. 146) of 2011; unauthorized personnel are not permitted to kill a conflict lion unless under exceptional circumstances. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

VII. Evaluation:

In evaluating whether the importation of Mr. Ellington's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our permit issuance criteria, we examined how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We considered whether the management program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We evaluated government incentives designed to increased habitat protection for lions by private

landowners and communities, and incentives provided to local communities designed to lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions. We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. As such, we examined if the trophy hunting provides financial/resource assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how a U.S. hunter's, in this case, Mr. Ellington's, participation in the hunting program contributes to the overall management of lions within the country.

As stated earlier, the Service has evaluated this application in accordance with our regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine for this application that the import of the wild lion trophy animal would enhance the propagation or survival of the species in the wild and qualifies for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the proposed activity in this permit application (import of a trophy hunted lion from Tanzania) has demonstrated the ability to contribute towards positive conservation outcomes that mitigate or improve the status of lions throughout their range while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion that collectively contribute towards continued population declines.

Tanzania faces a growing human population, and a subsequent development of land and increasing rates of human-wildlife interactions. Protection of suitable habitat for both the lion and its prey is essential for the survival of the lion, as well as developing and sustaining the local communities' support for such policies. Wildlife protected areas, in various forms, cover about 40% of Tanzania's land area, and safari hunting has created a financial incentive to maintain these protected areas as a land use. Both the consumptive and non-consumptive utilization of wildlife resources contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations.

The companies awarded a hunting block are in a key position to conserve this land for wildlife, and are annually evaluated by the Tanzania government on several criteria, including the maintenance of prey populations, contributions/provision of benefits to the local villages, improvement to infrastructure, protection of the environment, and anti-poaching operations.

Mr. Ellington hunted with Muhesi Safaris, Ltd., a subsidiary of Tanzania Wildlife Company (2000) Ltd., which operates under a management agreement with Tanzania Big Game Safaris. Tanzania Big Game Safaris has developed several programs by which to address the main threats to lion populations.

- The company maintains significant anti-poaching efforts year round, with five active anti-poaching teams, two of which are funded by the Conservation Foundation Trust (CFT), a non-profit organization founded by the Ramoni family. CFT anti-poaching units work in tandem with the game scouts and project managers on ground patrol teams to achieve successful anti-poaching objectives. Anti-poaching teams consist of over 50 anti-poaching government game officers. The teams work to protect against potential threats to habitat loss and the loss of game. Officers protect areas from illegal poachers, woodcutters, illegal miners, illegal fishermen, illegal honey gatherers, and cattle herders within the boundaries of the game reserves. CFT has been involved in operating mobile anti-poaching units equipped with vehicles, including a helicopter for aerial patrols, camping equipment, radios, GPS units, and cameras. Successful operations result in rewards for the game officers. These successes include confiscation of ammunition, gun powder, snares, muzzle loaders, traps, chain saws, spears, knives, machetes, and arrows, along with the parts and products poached including timber, game meat, and fish. Many poachers have been apprehended, arrested, and cases are immediately opened against them when caught. Additionally, concession areas are maintained by clearing existing roads and creating new roads and airstrips

- Education initiatives have begun in surrounding villages pertaining to the conservation of wildlife and their direct benefits to the village members.

- The company protects prey base species by creating a 3,000 liter water storage tank in response to officers noticing prey species dying due to a lack of water in the game reserve area. Teams made two rounds per day to ensure water was maintained within the tank.

- Tanzania Big Game Safaris targets old lone males that no longer breed and are not associated with a pride, females, or cubs. All harvested lions must pass the age requirement of being a minimum of 6 years old for take in Tanzania. It is common practice for companies to not harvest lions younger than age 7, and Tanzania Big Game Safaris rarely harvests lions younger than 8 years of age.

- The company requests reports of all lion sightings, which they track in a database. From 2013-2015, based on the number of reported lion sightings at Rungwa Ikili Game Reserve, where Mr. Ellington conducted his hunt in the Kizigo area, lions within prides have increased gradually from 87 to 110 overall.

It has been stated that upwards of 200 lions are killed annually due to preemptive strikes or as retaliatory actions after some form of direct loss is experienced by an individual or community (TAWA, 2016). In the Ruaha communities surrounding hunting blocks and the Ruaha National Park, researchers reported 35 large carnivores were killed over an 18-month period. Similarly, Lichtenfeld et al. (2015) reported that in 12 communities of the Maasai Steppe region, more than 50 attacks by large carnivores on livestock resulted in retaliatory killing of 72-84 lions. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles

people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

As described above, we have determined that the government of Tanzania and Tanzania Big Game Safaris contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Tanzania. Further, the fees garnered through Mr. Ellington's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

A myriad of issues and factors, largely related to an increasing human population, complicate and put at risk the management of Tanzania's wildlife (Kideghesho, Rija, Mwamende, & Selemani, 2013). It is likely that the lion populations that exist outside of protected areas will continue to decline (Riggio et al., 2013), making the existence of these protected areas all the more important. The trophy-hunting program in Tanzania provides a revenue source necessary to maintain and manage protected areas from encroachment or elimination.

It is a widely supported belief that increasing the benefits for those who live with and bear costs of wildlife damage or injury by wildlife can increase tolerance of wildlife, especially of large carnivores (e.g. lions) (Bencin, Kioko, & Kiffner, 2016; Lindsey et al., 2013; Winterbach, Winterbach, Somers, & Hayward, 2012). Mr. Ellington hunted with a subsidiary of Tanzania Big Game Safaris, which, as outlined below, will provide an indirect benefit to the lion population by generating revenue to help support and maintain a hunting block where lions are found. Tanzania Big Game Safaris is required by Tanzanian law to pay directly a USD 5,000 community development fee to the villages in the hunting area. The company has contributed significantly, aiming to develop and maintain a strong relationship with these villages. These contributions have paid school fees, constructed classrooms and offices, purchased books and school supplies, a water tank, modern pit latrines, desks, computers, printers, and donated wheelchairs through the Wheelchair Foundation. The Service is further encouraged by the recent action taken by the MNRT to amend the WMA regulations enabling these communities to receive a greater proportion of revenues returned on wildlife uses.

Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

The government of Tanzania has implemented a number of policies and regulations to monitor and control the harvest of lions in the country. Therefore, the issuance of an import permit for a

lion legally hunted in Tanzania does not conflict with any programs intended to enhance the survival probably of the species in Tanzania.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, almost 40% of all remaining lions are found in Tanzania. The lions located within protected areas are under the legal authority of MNRT, as well as subjected to direct management activities by hunting companies. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the maintenance of these protected areas by hunting companies is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. The cost of operating a hunting block is considerable, and lion safaris are a large source of revenue for hunting companies. This revenue is, in part, what allows the company to first and foremost maintain a presence in this protected area, and subsequently maintain an anti-poaching program, and to aid in local community development, all factors which reduce the threats faced by lions.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt associated with Mr. Ellington's application contributes to reducing the threat of extinction of lions in Tanzania. The utilization of hunters such as Mr. Ellington in supporting the safari hunting industry is an important element of the success of lion management in Tanzania.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduce the threat of extinction facing lions in Tanzania.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that legal and sustainable harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

The long-term survival of lions in Tanzania is tied directly to the success, both ecologically and economically, of the protected areas. Based on our understanding of the hunting block allocation and management, companies must submit annual reports that address several criteria, including the maintenance of key prey populations, contributions to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

Therefore, based on the information available to the Service, the applicant hunted in a hunting block with an operator that carries out their management practices in accordance with national regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

VIII. Conclusion

As stated earlier, this application received by the Service for the import of a sport-hunted trophy lion from Tanzania has been evaluated on an individual basis. The major threat facing lions today is the loss of habitat to humans, and the subsequent consequences of living among humans (e.g., decrease of prey base due to bush-meat consumption, increase in human-lion conflict). The occupation and maintenance of hunting areas by hunting concessions -- an industry supported by U.S. hunters such as Mr. Ellington -- protects lion and prey habitat through legal hunting by preventing conversion of such land to other uses, thereby contributing to the enhancement of this species. In addition, the financial benefits to local communities generated from lion safari hunting creates incentives for protection of lions, resulting in fewer lions lost as a result of human-lion conflict, which further contributes to enhancement of this species. Given the status of lions in Tanzania and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant hunted in a hunting block that is actively managing lions in a manner that mimics natural processes. The applicant attests in the application that the hunt occurred on a properly licensed hunting block, and this finding is contingent on the hunting block where the lion was taken, having been properly licensed and fully in compliance with national and local regulations.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of the sport-hunted trophy of this wild lion will enhance the propagation or survival of the species in the

wild. Therefore, the Service **is able to authorize the import of one male trophy lion taken from the wild in Tanzania, to Scott B. Ellington, Dallas, Texas.**

HEATHER HARCUM
Digitally signed by HEATHER HARCUM
Date: 2020.04.06 08:02:59 -04'00'

Heather Harcum, Biologist
Branch of Permits
Division of Management Authority

MARY COGLIANO
Digitally signed by MARY COGLIANO
Date: 2020.04.17 22:14:46 -04'00'

Mary Cogliano, Ph.D., Chief
Branch of Permits
Division of Management Authority

References

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L. T. B., . . . Packer, C. (2015). Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. *Proceedings of the National Academy of Sciences of the United States of America, 112*(48).

Bencin, H., Kioko, J., & Kiffner, C. (2016). Local people's perceptions of wildlife species in two distinct landscapes of northern Tanzania. *Journal for Nature Conservation, 34*, 82-92.

Björklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (*Panthera leo*). *Conservation Genetics, 4*(4).

Brink, H., Smith, R. J., & Skinner, K. (2013). Methods for lion monitoring: A comparison from the Selous game reserve, Tanzania. *African Journal of Ecology, 51*(2).

Funston, P. J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A., Macdonald, D. M., . . . Ferreira, S. M. (2010). Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology, 281*(1), 56-65.

Ikanda, D. K., & Packer, C. (2006). *Lion abundance and distribution in Tanzania - A status report to the Wildlife Division.* Unpublished manuscript.

Ikanda, D. K. (2008). *Non-detriment report under CITES regarding the export of African lions (Panthera leo) from the United Republic of Tanzania.* NDF Workshop Case Studies, WG5 - Case study, 20 pages.

IUCN SSC. (2012). *IUCN SSC guiding principles on trophy hunting as a tool for creating conservation incentives. ver. 1.0.* IUCN, Gland.

Kideghesho, J., Rija, A., Mwamende, K., & Selemani, I. (2013). Emerging issues and challenges in conservation of biodiversity in the rangelands of Tanzania. *Nature Conservation, 6*(18), 1-29.

Lichtenfeld, L., Trout, C., & Kisimir, E. (2015). Evidence-based conservation: Predator-proof bomas protect livestock and lions. *Biodiversity and Conservation, 24*(3), 483-491.

Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., . . . Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PLoS One, 8*(9).

Mesochina, P., Mbangwa, O., Chardonnet, P., Mosha, R., Mtui, B., Drouet, N., . . . Kissui, B. (2010). *Conservation status of the lion (Panthera leo linnaeus, 1758) in Tanzania.* Paris.

MNRT. (2015). *Comment on ESA status review of African lions, January 27, 2015*. Ministry of Natural Resources and Tourism, Dar es Salaam.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H., & Caro, T. (2011). Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology, 25*(1).

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., . . . Pimm, S. (2013). The size of savannah Africa: A lion's (*Panthera leo*) view. *Biodiversity and Conservation, 22*(1).

TAWA. (2016). *Non-detriment findings on African lion (Panthera leo) in the United Republic of Tanzania, including enhancement findings*. Tanzania Wildlife Management Authority, Tanzania.

TAWIRI. (2009). *Tanzania carnivore conservation action plan*. TAWIRI, Arusha, Tanzania.

Whitman, K. L., Starfield, A. M., Quadling, H., & Packer, C. (2007). Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions. *Conservation Biology.*

Winterbach, H. E. K., Winterbach, C. W., Somers, M. J., & Hayward, M. W. (2012). Key factors and related principles in the conservation of large African carnivores. *Mammal Review, 43*, 89-110.

WTTC. (2017). *Travel and tourism. Economic impact 2017: Tanzania*. World Travel & Tourism Council, United Kingdom.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Heather Harcum Date: 04/06/2020

Telephone Number: 703-358-2104

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)
Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, **Scott B. Ellington** (PRT # 02691D) has requested a permit to import a trophy of one lion that he lawfully hunted in Tanzania. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Tanzania on the date specified in the permit application. The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Tanzania. The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Tanzania. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

	Determination
No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.**	**X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

MARY COGLIANO

Digitally signed by MARY COGLIANO
Date: 2020.04.17 22:06:47 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature:_____ Date: _____

Permit Number: MA02691D-0
Effective: 04/06/2020 Expires: 04/05/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

MARY COGLIANO
Digitally signed by MARY COGLIANO
Date: 2020.04.17 22:09:34 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
SCOTT B. ELLINGTON
(b)(6) [redacted]

U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12.

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Tanzania.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Import Permit for Sport-hunted Lion from Tanzania

Harcum, Heather L <heather_harcum@fws.gov>

Mon 4/20/2020 2:12 PM

To: (b)(6) [redacted]

2 attachments (254 KB)

20-04-06_02411D_Final.pdf; WGEN Conditions.pdf;

Good a. ernoon Sarah,

Mr. Elmer B. Ellington's import permit for his sport-hunted lion trophy (MA02411D-0) has been **issued**. You can find the permit as an attachment to this e-mail along with general perming c ondions f or wildlife specimens.

Please let me know if you have any quesons or c oncerns.

Best regards,

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 15 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LILLIS	CHRISTOPHER	MICHAEL	

(b)(6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (b)(6) boxes)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MIDLAND	TEXAS	79705	MIDLAND	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signatu(b)(6) tures) Date of signature (mm/dd/yyyy) 08/08/2018

xt page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo Genus Pardus (common name) African Lion

   b. Sex (if known).
   Male (females not allowed to be harvested in Tanzania)

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   Tanzania Mkele North Game Control Area
   Region - Katavi Hunting Block Mkele North Control Game Area
   Nearest City Tabora

   b. Date wildlife is to be hunted:
   To be determined as will be on Safari for the duration of 28 days. Dates from Sept. 2 - 29th 2018.

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Wild Footprints Limited
   Raoul Ramoni
   Johnny Vakas

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

The affiliate companies along with Tanzania Big Game Safaris are all under one-management agreement with Tanzania Big Game Safaris. Tanzania Big Game Safaris has been operating in Tanzania since 1988. Since its inception, the founder and managing director is Raoul Ramoni. Raoul has always been extremely active in Wild life conservation. He has always been a true custodian of the land and wildlife. In addition, he has a very strong and active anti-poaching team working throughout the year in each of the concession areas. In some cases, depending on the size of the area he is managing, he employes over five active anti-poaching teams with over 50 anti poaching officers that are protecting a single area. They protect this particular area from illegal poachers, woodcutters, illegal miners, illegal fishermen, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserve. Due to the very stringent wildlife management program, these areas under his management have a very healthy and sustainable game population. Amongst the game found in these areas there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been able to properly manage the areas. Thus, this dramatically limits the harvesting of male lion to only an older more mature male type of

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economi[redacted] elephant trophy, I understand that I may import no more than two el[redacted]

    Applicant's signature: [redacted] Date: 08/08/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Butzler, Julia <julia_butzler@fws.gov>

Import application / TZ lion / Withdrawn

1 message

Butzler, Julia <julia_butzler@fws.gov> Mon, Aug 26, 2019 at 1:58 PM
To (b)(6)

Mr. Lillis,

Thank you for taking the time to speak with me this afternoon. As discussed, I have withdrawn your application, as well as your brother-in-law's application (Mr. Isbell), to import a lion taken in 2018 from Tanzania.

Sincerely,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 15 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Isbell	James	Hunter	

(b)(6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Midland	Texas	79705	Texas	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

or permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

08/08/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera Leo Genus Pardus (Common name)
African lion

b. Sex (if known).
Male (Females not allowed to be harvested in Tanzania

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
Tanzania Mlele North Game Control Area Region - Katavi hunting Block Mlele North contro Game Area. Nearest City Tabora

b. Date wildlife is to be hunted:
To be determined as will be on Safari for the duration of 28 days. Dates from Sept 2 - 29 sept 201

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
Wild Footprints limited
Raoul Ramoni
Johnny Yakas

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name:
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted The affiliate companies along with Tanzania Big Game Safaris are all under one management agreement with Tanzania Big Game Safaris, Tanzania Big Game Safaris has been operating in Tanzania since 1989. Since its inception, the founder and managing director is Raoul Bunniface | has always been extremely active in Wildlife Conservation. He has always been a true custodian of the land and wildlife. In addition he has very strong and active anti-poaching team working throughout the year in each of the concession areas. In some cases, depending on the size of the area he is managing, he employs over five active anti-poaching teams with over 50 anti poaching officers that are protecting a single area. They protect this particular area from illegal poachers, wood cutters, illegal miners, illegal fishermen, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserve. Due to the very stringent wildlife program, these areas under his management have a very healthy and sustainable game population. Amoungst the game found in these areas, there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been able to properly manage the area. Thus, this dramatically limits the harvesting of male lions to only an older more mature male typically over the age of eight years and that is usually a single male lion

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in [redacted] plying to import a leopard trophy, I understand that I may only import two l[redacted]

Applicant's signatu[redacted] _____ Date: 08/08/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Butzler, Julia <julia_butzler@fws.gov>

Import application / TZ lion / Withdrawn

1 message

Butzler, Julia <julia_butzler@fws.gov> Mon, Aug 26, 2019 at 1:58 PM
To: (b)(6)

Mr. Lillis,

Thank you for taking the time to speak with me this afternoon. As discussed, I have withdrawn your application, as well as your brother-in-law's application (Mr. Isbell), to import a lion taken in 2018 from Tanzania.

Sincerely,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH D.
† BART O'GARA, PH.D.
† DON LINDSAY
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August 22, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD AUG 23 2018

RE: Import applications for RSA Wild Managed Lion Trophies for Fredd Williams, Jacob Williams and Edward Aguilar

Dear Chief Cogliano:

Enclosed please find three applications to import "wild managed" lion trophies that were hunted in the Republic of South Africa. Also attached to each permit application is the 2018 Operator Enhancement report from Graceland Safaris, the hunting operator in this instance.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

encl:

- Edward Aguilar's Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Jacob Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Fred Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD 8/23/2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Type of Activity WML:ON-RSA

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Williams	Jacob	Walton	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	78261	Bexar	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer (Do not submit photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6) 07/28/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo, African Lion

b. Sex (if known). Female

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Nuutbegin Nature Reserve, Vorstershoop, North West Providence, South Africa

b. Date wildlife was hunted:

June 12-24, 2018 (Date of harvest June 14,2018)

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Graceland Safaris, Rowan Zerf Outfitter Permit No. HO-003/04/2018NW PH Permit No. PH-010/04/2018NW

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

P&A Hunters cc P.O. Box 332, Bela Bela 0480. Farm 34, Droogekloof, Bela Bela 0480 Republic South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Peter de Villiers
Business Name:	P & A Hunters cc
Address:	PO Box 332 Bela Bela 0480
City:	Farm 34, Droogekloof, Bela Bela 0480
State/Province:	Republic South Africa
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

SEE ATTACHED

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

SEE ATTACHED

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

    Applicant's signature: (b)(6) Date: 07/28/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9.a. (page 4)

Four Lions were introduced from the Tswalo Reserve in 2012. This has swelled to a current group of over 40 lions. There are no spotted Hyena, Leopard or Cheetah left on the reserve as a result of the lion burden. Since all of the males came from the same family there has been no evidence of the males killing off any of the offspring. The Lioness' are breeding incredible well and the survival rate of the cubs is high due to no other predation threat present.

9.b. (page 4)

The Licenses and trophy fees are allocated to the local government Nature Conservation for wages and salaries to further conserve the species and to give the land owners incentives to continue to conserve the species. The land owner is currently face with an overpopulation situation with his lions and they are having a detrimental effect on other species of wildlife on the reserve. The trophy fees have contributed to the staff salaries on the reserve and a large portion towards the anti-poaching units deployed on the reserve to safeguard the lions against the illegal lion bone trade as well as funding for extra armed security for the help protect the reserve's rhinos from being poached. This hunt was the first lion hunt on the reserve since the lions were introduced in 2012. The need to manage the numbers of lions has become a pressing matter as well as needing to raise funds for the aforementioned rhino anti-poaching unit after seven rhinos were poached last year alone.

9.c. (page 4)

The financial contribution of trophy hunting has provided an opportunity to employ members of the poverty stricken local community surrounding the reserve. In the past, hunger and lack of jobs or income has forced people to cross the border from Botswana side to set snares, traps and poach bush meat to feed their families. Having a reserve like Nuutbegin in the Vorstershoop region has begun to remedy some of these problems as people are now being employed by the local taxidermist, butchery and as camp staff and maintenance crew.
The owner is looking to introduce a new bloodline into the reserve to avoid inbreeding, which is costly. In hunting some of the lions on the reserve it provides him with funding to purchase and translocate lions from another region. Removal of some of the dominate reserve lions will also allow for a better opportunity of survival of the new translocated lions into the reserve.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted LIONESS trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signe(b)(6)

Name: JACOB WILLIAMS

Date: 6/28/18

ZODIAC DIEREKLINIEK

Registrasie no: 2003/089560/23 FC12/12051
DR. GS SCHEEPERS BVSc.
31 CAREL DE WET WEG BRITS.
POSBUS 450, BRITS 0250
TEL: 012 252 1266 FAX: 012 252 6357
EMAIL: zdk@vodamail.co.za

12 February 2018

To Whom It May Concern
Veterinary statement

Re: Origen of the Nuutbegin Naluur Reservaal Lions.

I, Gerhardus Scheepers, ID 7404265006087, a veterinarian registration number D99/4295, state that the following information is true and correct as given in the sentences below.

I did the darting and relocation of 4 lions from Tswalo to Nuutbegin in late January 2012. I travelled with them from Tswalo to Nuutbegin and off loaded in the temporary holding boma before being released onto the Reserve.

This all happened between 19 and 22 January 2012. We had to stay a day longer at Tswalo before we could dart and load the lions due to an issue with issuing the permits from North West Nature conservation side.

The darting procedure took place on an afternoon. I darted the female with her two cubs, a male and female, whilst they were feeding on a Blue wildebeest carcass. After being immobilised, a radio collar was fitted to the female and they were loaded into three transport crates and loaded on the back of two vehicles. At the same time Dr Griesel and Gus van Dyk darted the adult male in a different part of Tswalo. He was also fitted with a radio collar, crated and loaded.

We set off at approximately 20h00 from Tswalo on our way to Nuutbegin. Gus and Dylan accompanied us in their own vehicle to Nuutbegin to be with when we off load them. The journey took about 6 hours on road and we off loaded them safe in the holding boma at Nuutbegin.

The morning we inspected them and were happy to see that they are well and no fighting between the male and the cubs. Gys and Dylan were also satisfied and left at about midday on their way back to Tswalo.

These lions have never been bred in a captive facility. They were wild roaming lions originating from the then Kalahari Gemsbok National Park. They are still to this wild and free roaming on Nuutbegin. During 2016 the collars of both the male and female were removed as they stopped working.

Dr G S Scheepers BVSc
D99/4295

16th February 2018

John Power
Terrestrial Ecologist
North-West Province

Dear Mr Power,

Oppenheimer & Son and its subsidiaries, protect and conserve a network of conservation areas throughout southern Africa, where conservation of landscapes and their animal and plant communities are assured. Some of our reserves are large enough to stock large carnivores, such as the lion *Panthera leo*, i.e. Tswalu Kalahari Reserve.

We endeavour to protect lions that are self-sustaining as far as their forage requirements are concerned, while dispersal is facilitated by translocations to ensure gene flow elsewhere, within the framework as suggested by the Lion Biodiversity Management Plan (Lion BMP). Following this, we have, and will continue to translocate lions to other suitable destinations. These lions are wild, yet managed, and will go to receiving destination of the same nature. In this, either sales, or donations are made, and we are fully versant with the nature of the receiving populations, such that no animals will be sent to captivity or any places of questionable nature.

None of our properties have captive facilities which harbour lions, and neither do we/ or have entertained the prospects of any transactions related to captive-bred lions. In fact, as a conservation entity, we are strongly opposed to the captive-bred lion industry, and we absolve ourselves from any association with this industry.

Please feel free to contact me should you have any queries.

With very best wishes,

Dr Duncan MacFadyen

Manager: Research and Conservation
Oppenheimer Generations

Tel: +27 11 274 2184
Fax: +27 11 274 2185
Cell: +27 83 379 2139

www.oppenheimerproperties.com

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5777
Fax: +27(18) 389 5640
E-mail: JDenga@nwpg.gov.za

Dr D.L Griesel
P O Box 17
Vorstershoop
North West Province
8615

E-mail: dlgriesel@gmail.com
Cell: 083 6302534

Dear Dr Griesel

SUBJECT: CONFIRMATION OF CLASSIFICATION OF YOUR NUUTBEGIN NATURE RESERVE'S LION POPULATION AS WILD MANAGED

1. Chapter 5 of the Lion Biodiversity Management Plan (BMP) published in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) outlines a meta-population plan for Managed Wild Lions (MWL) in South Africa. The plan proposes a national management system composed of linked regional nodes of properties that simulate a meta-population approach whereby different lion groups living on different properties make-up a node's population, i.e. a single population as if these prides were living together.

2. These populations (nodes) should have different vital rates (i.e. births, deaths, dispersal events, colonization etc.), and there should be some occasional dispersal between populations as well as regular movements between properties within nodes; and Implementation of the national management system will thus mimic population and meta-population dynamics, which in-turn would promote genetic diversity and reduce inbreeding risks.

3. On your request, the Department of Rural, Environment and Agricultural Development (READ), extensively conducted verification work in determining the status of lion population on your Nuutbegin Nature Reserve.

4. We have perused various documentations, including those submitted by yourself as well as the affidavit you made under oath, as portfolio of evidence to ascertain the state of wildness of the said population. And, the department has concluded, from all evidence provided and the scientific report compiled, that indeed the lion population on Nuutbegin Game Reserve can be classified as **Wild Managed Lions** as defined in the Lion Biodiversity Management Plan which is nationally mandated.

5. Attached for your perusal is the scientific report compiled which elaborates on the findings. And, any utilization of the said lions must be in accordance with *the guidelines for the implementation of a meta-population management plan for managed lions in South Africa "SA-2017-9-Add1"*, with specific reference to trophy hunting.

We look forward for your participation in the forging of the Kalahari Savanna Node for Wild Managed Lion management.

Yours Sincerely,

MR. M.J. DENGA
DIRECTOR – BIODIVERSITY MANAGEMENT
DATE: 24/04/2018

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka
& Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

DIRECTORATE: BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5568
Cell: 0761982502
E-mail: JPower@nwpg.gov.za

SCIENTIFIC REPORT

SUBJECT : CLASSIFICATION OF NUUTBEGIN NATURE RESERVE LIONS AS A MANAGED WILD POPULATION

19 FEBRUARY 2018

1. BACKGROUND

The Lion (*Panthera leo*) Biodiversity Management Plan (BMP) which was produced in 2015 defined the various categories into which lions are kept and managed in South Africa. These were of three types, firstly, a) captive-bred lions, which are typically kept in small enclosures, and are entirely dependent on humans to provision their food, and they are managed in a highly intensive way, where even their breeding is manipulated for optimal production. Secondly, there are 'managed wild lions', which roam free on fenced in game farms or nature reserves where they are less intensively managed and the lions can sustain themselves from prey they capture, while they can exercise their own choice when it comes to breeding. Thirdly, there are wild lions, which occur in this country only in very large ecosystems, such as the Kgalagadi and Kruger systems. In the North West, the first two categories are applicable.

In 2016 NW READ submitted a list of reserves with details on their area size, population size, and management types to SANBI, so they can be categorised according to the Lion BMP. All four reserves (Madikwe, Pilanesberg, Khamab & Nuutbegin) were assigned to the 'Wild managed lions' category.

The lion population of Nuutbegin Nature Reserve has his grown to about 40 since the introduction of 4 lions in 2012 and hunting is considered to control the population size.

population as the trophies cannot be exported under the CITES source code W, and at present the USA does not allow the import of captive-bred lion trophies (source code C). The Nuutbegin population management adheres to these principles and compliance with US F&WS requirements.

2. PURPOSE

To classify the Nuutbegin Nature Reserve lion population as a wild managed population.

3. DELIBERATIONS

3.1. Nuutbegin acquired 4 lions (2 males/ 2 females) from Tswalu Kalahari Reserve in 2012 (see attached copy of permit no. 648). There are currently about 40 lions on Nuutbegin.

3.2. The founder population of Tswalu was obtained from free roaming lions originating from the Kgalagadi National Park (See attached letters from E. Oppenheimer & Son (PTY) Ltd. dated 16 February 2016 and Zodiac Diereklinick dated 12 February 2018).

3.3. The lions were let out of the pre-release boma on Nuutbegin 10 weeks after arrival.

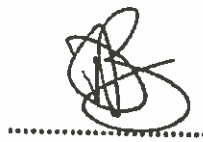
3.4. No other lions have been introduced to Nuutbegin NR (affidavit Dr Griesel dated 19 February 2018).

3.5. Nuutbegin is 23 000ha in extent and the lions exclusively live of the free roaming wildlife occurring on the farm.

3.6. The founder population of the lions on Khamab Kalahari Reserve Nuutbegin NR also originated from Tswalu. The Khamab population is classified as managed wild.

4. RECOMMENDATION

BSS hereby confirms that the lion population on Nuutbegin NR is managed as a wild population, with only population management to maintain numbers within the limits of the size of Nuutbegin NR.



.....

Mr Daan Buijs, MSc, *Pr. Sci. Nat.*

Senior Scientist: BSS

19 Feb 2018

.....

Mr Willem Boshoff , MSc, *Pr. Sci. Nat.*

Deputy Director: BSS

19/2/2018

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER

NAME OF ISSUING AUTHORITY	
NAME	DACERD
ADDRESS	JK BUILDING, MARKET STR P.O. BOX 112, VRYBURG 8600
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER			
NAME	DR. DAVID. L	ID NO	3604095013088
SURNAME	GRIESEL	PASSPORT NO	-
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O. Box 17		Nuutbegin
ADDRESS	Vorstershoop		Nature Reserve
ADDRESS	-		-
TOWN	Vorstershoop		Vorstershoop
POSTAL CODE	8615		-
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Dr. D.L Griesel
NAME AND SURNAME RESPONSIBLE PERSON	Dr. D.L Griesel
NAME AND SURNAME OF AGENT	-
PHYSICAL ADDRESS OF FACILITY	Nuutbegin Nature Reserve
PHYSICAL ADDRESS OF FACILITY	Vorstershoop
TOWN	Dr. Ruth Segomotsi Mompati
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Transport of 04 Wild Lions From Tswalu Kalahari Reserve (Northern Cape) to Dr. D.L Griesel, Nuutbegin Nature Reserve, Vorstershoop North West Province. Lions to be Kept in Pre-Release Boma's on Nuutbegin

NAME AND SURNAME OF PURCHASER/SELLER	G. van Dyk
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	Tswalu Kalahari Reserve

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM: 2012-01-16	TO:	2012-02-16
RECEIPT NUMBER	R50-00 Direct Deposit		
K.R KGETSANE			
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP		Department of Agriculture, Conservation, Environment & Rural Development Dr Ruth Segomotsi Mompati District 16-01-2012 Posbus/P.O. Box 112, Vryburg 8600	

VISION PRESS TEL 2[illegible]

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTERED TRUST

Durration of Guiding Commenced 12 / 06 / 2018 Terminated 25 / 06 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	Noth West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Nothern Cape (NC)
				X				

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: ROWAN ZERF
Business Address: 71 15th Street
Menlo PARK, PTA
Code 0181
I.D. No: 8311075037088
PH Permit No: PH-010/06/2018 NW
Date: 25/06/2018 Signature

CLIENT

Name: JACOB WALTON WILLIAMS
Permanent Postal Address (b)(6)
FORT SAN ANTONIO, TX
Code 78261 Country USA
Passport No (b)(6)
Tel/Fax: N/A
Date: 25/06/2018 Signature (b)(6)

HUNTING OUTFITTERS

Name: ROWAN ZERF
Business Address: 71 15th STREET
MENLO PARK PTA
Code 0181
I.D. No: 8311075037088
Tel: 0631513451 Fax:
PH Permit No: HO-003/06/2018 NW
Date: 25/06/2018 Signature

Farm Name Registration No:	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No:	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
NUULBEGIN		DAVID GREEF	DRSM0372/3/	11/06/2018	LIONESS	1	X		SKULL SKIN ZUM SKIN INCL 12 CLAWS
DRSM06/06/2018 -		NUULBEGIN	2018						
201 - 203NW		R0375	NW2799/05/2018						
NWR04/420/0000 1		VORSTERSHOOP							

Copies: Client Original (White)
1st copy (Pink) Foward to Nature Conservation Authority where hunt took place
H[illegible]er Outfitter 2nd Copy (Blue) Retain for a period of three years
Pro[illegible]ssional Hunter Last copy (white) Remains in book

Address to which trophies are to be sent: TBA
Code:
Country: Trophy Export Date (Estimate):

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt .375 Caliber

Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act No.3 of 1973; (2) Transvaal Nature Conserv. Ordinance, No.12 of 1983; (3) Cape Nature Environmental Conservation Ordinance, 19 c 1974

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details		Physical Address		Postal Address	
Surname	Griesel	Building		P O Box	17
Full Name	Dr David	Street	Rd 375 Vorstershoop to Mokopong	Post Office	Vorstershoop
Id Number	3604095013088	Suburb			
Passport	N/a	Town	Vorstershoop	Town	Vorstershoop
Cell Home	0836302534 home 053 939 0100	Area Code	8615	Postal Code	8615
Tel Home	053 939 0100	Division/Region	Dr Ruth Segomotsi Mompati	District/Region	Dr Ruth Segomotsi Mompati
Tel Work	053 939 0100	Province/State	NW	Province/State	North West Provinc
Fax Home	053 939 0101	Country	South Africa	Country	South Africa
Email	digriesel@gmail.com				

REGION

NorthWest

LOCATION

Facility

Property
Property Name: NUUTBEGIN NATURE RESERVE
Building:
Street:
Suburb:
Town:
Area Code:
Division/Region:
Province/State:
Country:

NATURE CONSERVATION PERMIT OFFICE
NORTH WEST PROVINCE
30 May 2018, 09:02 AM

Stamp of Issuing Authority

Stamp if applicable

Permit holder / Dealer

VALIDITY PERIOD

FROM 29/05/2018 TO 28/07/2018

Signature of Issuing Authority
(Bertha Mangenye)

30 May 2018, 09:02 AM

Signature of Permit Holder
(Dr David Griesel)

30 May 2018, 09:02 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, P
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

ADDENDUM

PROPERTIES

Name	Town	Province	Country
MAITBEGIN NATURE RESERVE			

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Female	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
ROWAN ZERF	PH-010/04/2018 NW	0834513451	0834513451

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
ROWAN ZERF	HO-003/04/2018 NW	0834513451	0834513451

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
JACOB WALTON WILLIAMS	(b)(6)	12/06/2018	25/06/2018	(b)(6) SAN ANTONIO, SAN ANTONIO, 78261, TEXAS, USA, USA

ACTIVITIES

Activity Name
Hunt

(b)(6)

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Di Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This p valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the s methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This p only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the sign the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permi time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protecte National Park, Provincial Nature Reserve or privately owned land and : - a) the permit holder must beforehand obtain all other relevant permissions, documents, rights and licences. b) the permit holder must comply with any other / further condition or restrictions that the rel landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized 12) An authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register re the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after perfor completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the together with all other relevant written permissions, documents, rights and licenses for a period of at least (3) two years from date of issue or for as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall a the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date there Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback rep been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to: - a) all applicable norms and stan existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to wh permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By sign permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or f render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed f to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (375 of an inch H&H) is used to hunt elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a p

Signature of Issuing Authority
(Bontle Manganye)

30 May 2018, 09:02 AM

Signature of Permit Hol
(Dr David Grieser)

30 May 2018, 09:02 AI

North West Department of Rural, Environment and Agricultural Development. (READ), Cor. Dr. James Moroka Drive & Stadium Road, I
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

twenty four (24) months prior to the hunting thereof. e) no hunting of rhinoceros or lion takes place unless a representative of the relevant natu conservator appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as w anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm barrel of a caliber of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebe antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rh hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written perm prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as pre applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild a / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provid hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is imp distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to an organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties the permit holder.

Signature of Issuing Authority
(Bonno Mangamya)

30 May 2018, 09:02 AM

Signature of Permit Ho
(Dr David Grissel)

30 May 2018, 09:02 A

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road,
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: David Griesel
   a. Years in business: 50+
   b. Name of company conducting hunt: Graceland Safaris
   2. Name of concession: Nuutbegin Size in km²: 250
   a. Land tenure: __ Government lease __ Community __ Private ranch _x_ Private conservancy
   b. Length of concession agreement: For the Period of the Hunt Can it be renewed? _x_ Yes __ No
   c. Length of renewal, if applicable: _____
   d. Estimated total amount received in trophy fees last year, if applicable: $ 300,000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

It has not been obligatory, but due to the reserve opening for hunting, members of the local community have been employed by the reserve to facilitate in hunting, game management and more importantly anti-poaching. They have had problems in the past with Rhino Poaching.

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

S 25° 28.36' E 022°53.79' - Nearest town is Vorstershoop and the Nearest City is Vryburg

   g. If the concession borders a national park, please provide the park name: _____
   h. Description of general and distinctive habitat features and any water features:

As it is in the Kalahari, it is Semi Arid Desert. The Rainfall is low, but the reserve has a very good infrastructure of watering holes by means of a underground well and pumping facilities to keep water throughout the reserve

3. Are there any communities living in the concession? __ Yes __ No
   a. If so, estimated number of people or villages in the concession? _____
4. Are there communities bordering this concession? _x_ Yes __ No
   a. If so, estimated number of people or villages around the concession? approx 250 on RSA side, Botswana side Unknown, but likely more
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Elephant	None			
Lion	Dense	45+	4 were introduced in 2012	Aerial and land Survey
Leopard	Sparse	3, but mainly nomadic	Down due to the lions	Sightings and tracks
Prey species	Dense	in the 1000's	Down due to the lions	Aerial and land Survey

6. Total employment number: 25

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	1
Trackers	3	2
Anti-poaching scouts/rangers	4	4
Other anti-poaching	4 - Rhino Anti Poaching	4
Cooks/housekeepers	5	
Community coordinators		
Managers	5	5
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: All those that remain Local

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	Year round
Managers	3	3	Year round
Maintenance	6	6	Year round
Road opening/ construction	10	10	Contract based
Community relations personnel	unknown		
Others: _____			

8. Anti-poaching efforts:[2]
   a. Number of anti-poaching staff: 8 but when there is evidence of Rhino Poaching, neighbors an extra community members are called upon for additional assistance
   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both
   c. Months during which anti-poaching patrols are conducted: year round
   d. Number of anti-poaching patrols per month: Daily
   e. Description of anti-poaching equipment, vehicles, etc.: Vehicles, Flashlights and limited firearms
   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The SAPS
   g. Do you offer rewards to poaching informants leading to arrest? x Yes __ No
   h. Do you offer rewards to poaching informants upon conviction? __ Yes __ No
   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ZAR

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	32000	35200	38750	
Equipment	20000	20000	20000	uniforms and gear
Vehicles	300000	300000	300000	repayments on vehicles
Petrol	40000	47000	54000	
Rewards paid		15000	19000	Increase in Rhino Poaching
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		3	7	relating to Rhino

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated			2	
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered			2	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
Medical services and a mobile clinic is run by the reserve for the local community

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: R10000 meat was donated. There is not a program per say, it is based on how much meat is available as a result of trophy hunting

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
There is no wildlife outside of the reserve as they have all been poached and killed by snares.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Graceland Safaris takes care of their staff families in the form of school fees, medical needs and is currently rebuilding homes of a staff member who's home was burnt down

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: Rowan Zen Title: Owner

Graceland Safaris has a strict walk and stalk fair chase policy, and all hunting is done by methods of spot and stalk and track and stalk. We only harvest animals that are past their prime and our company ethos is driven by conservation. As we have several concessions throughout the republic, we do our outmost to not exhaust our natural wildlife heritage and rotate our concessions as often as possible and only take the allocated amount of species and numbers on the concessions as prescribed in the beginning of our seasons. We have our own offsite breeding facility of certain game species to ensure continuing increase in numbers of our wildlife. We have an array of trail cams scattered throughout our concessions for research and census purposes.

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] Lion permits

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Tue, Sep 10, 2019 at 9:57 AM
To: "Fred Williams, DVM (b)(6)
Bcc: emma_nelson@fws.gov

Good morning Mr. Williams,

The U.S. Fish and Wildlife Service International Affairs Program works to conserve our nation's wildlife and species of international concern. In order to provide our best customer service, we are currently focusing on processing permit applications and are not providing status updates on permit applications at this time. Once you receive your acknowledgement e-mail indicating your application number, please allow us time to evaluate your application. If we need additional information, we will contact you.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Mon, Sep 9, 2019 at 2:19 PM Fred Williams, DVM <fwilliamsdvm@satx.rr.com> wrote:

> To whom it may concern,
>
> I am checking into the progress on the permits No 04680D (Jacob Williams) and permit No 04696D (Fred Williams). These were submitted for evaluation a year ago and I have had no further contact from USFW since confirmation that the application packets were received. Can you please give me an update on where we are at in the process.
>
> Thank you
>
> Fred Willimas

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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August 22, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import applications for RSA Wild Managed Lion Trophies for Fredd Williams, Jacob Williams and Edward Aguilar

Dear Chief Cogliano:

Enclosed please find three applications to import "wild managed" lion trophies that were hunted in the Republic of South Africa. Also attached to each permit application is the 2018 Operator Enhancement report from Graceland Safaris, the hunting operator in this instance.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

encl:

- Edward Aguilar's Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Jacob Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Fred Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD AUG 23 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Lion RSA/WM

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Aguilar	Roy	Edward	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, T(b)(6)

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b)(6)ress, Apartment #, Suite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	78260	Bexar	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (b)(6) ermit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

07-28-2018

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo, African Lion

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Nuutbegin Nature Reserve, Vorstershoop, North West Providence, South Africa

b. Date wildlife was hunted:

June 12-24, 2018 (Date of harvest June 14,2018)

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Graceland Safaris, Rowan Zerf Outfitter Permit No. HO-003/04/2018NW PH Permit No. PH-010/04/2018NW

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

P&A Hunters cc P.O. Box 332, Bela Bela 0480. Farm 34, Droogekloof, Bela Bela 0480 Republic South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Peter de Villiers
Business Name:	P & A Hunters cc
Address:	PO Box 332 Bela Bela 0480
City:	Farm 34, Droogekloof, Bela Bela 0480
State/Province:	Republic South Africa
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

SEE ATTACHED

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

SEE ATTACHED

OMB Control No 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard[redacted]ar.

Applicant's signature: [redacted] Date: 07-28-2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9.a. (page 4)

Four Lions were introduced from the Tswalo Reserve in 2012. This has swelled to a current group of over 40 lions. There are no spotted Hyena, Leopard or Cheetah left on the reserve as a result of the lion burden. Since all of the males came from the same family there has been no evidence of the males killing off any of the offspring. The Lioness' are breeding incredible well and the survival rate of the cubs is high due to no other predation threat present.

9.b. (page 4)

The Licenses and trophy fees are allocated to the local government Nature Conservation for wages and salaries to further conserve the species and to give the land owners incentives to continue to conserve the species. The land owner is currently face with an overpopulation situation with his lions and they are having a detrimental effect on other species of wildlife on the reserve. The trophy fees have contributed to the staff salaries on the reserve and a large portion towards the anti-poaching units deployed on the reserve to safeguard the lions against the illegal lion bone trade as well as funding for extra armed security for the help protect the reserve's rhinos from being poached. This hunt was the first lion hunt on the reserve since the lions were introduced in 2012. The need to manage the numbers of lions has become a pressing matter as well as needing to raise funds for the aforementioned rhino anti-poaching unit after seven rhinos were poached last year alone.

9.c. (page 4)

The financial contribution of trophy hunting has provided an opportunity to employ members of the poverty stricken local community surrounding the reserve. In the past, hunger and lack of jobs or income has forced people to cross the border from Botswana side to set snares, traps and poach bush meat to feed their families. Having a reserve like Nuutbegin in the Vorstershoop region has begun to remedy some of these problems as people are now being employed by the local taxidermist, butchery and as camp staff and maintenance crew.
The owner is looking to introduce a new bloodline into the reserve to avoid inbreeding, which is costly. In hunting some of the lions on the reserve it provides him with funding to purchase and translocate lions from another region. Removal of some of the dominate reserve lions will also allow for a better opportunity of survival of the new translocated lions into the reserve.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: ROY E AGUILAR

Date: 7-28-18

16th February 2018

John Power
Terrestrial Ecologist
North-West Province

Dear Mr Power,

Oppenheimer & Son and its subsidiaries, protect and conserve a network of conservation areas throughout southern Africa, where conservation of landscapes and their animal and plant communities are assured. Some of our reserves are large enough to stock large carnivores, such as the lion *Panthera leo*, i.e. Tswalu Kalahari Reserve.

We endeavour to protect lions that are self-sustaining as far as their forage requirements are concerned, while dispersal is facilitated by translocations to ensure gene flow elsewhere, within the framework as suggested by the Lion Biodiversity Management Plan (Lion BMP). Following this, we have, and will continue to translocate lions to other suitable destinations. These lions are wild, yet managed, and will go to receiving destination of the same nature. In this, either sales, or donations are made, and we are fully versant with the nature of the receiving populations, such that no animals will be sent to captivity or any places of questionable nature.

None of our properties have captive facilities which harbour lions, and neither do we/ or have entertained the prospects of any transactions related to captive-bred lions. In fact, as a conservation entity, we are strongly opposed to the captive-bred lion industry, and we absolve ourselves from any association with this industry.

Please feel free to contact me should you have any queries.

With very best wishes,

Dr Duncan MacFadyen

Manager: Research and Conservation
Oppenheimer Generations

Tel: +27 11 274 2184
Fax: +27 11 274 2185
Cell: +27 83 379 2139

www.oppenheimerproperties.com

16th February 2018

John Power
Terrestrial Ecologist
North-West Province

Dear Mr Power,

Oppenheimer & Son and its subsidiaries, protect and conserve a network of conservation areas throughout southern Africa, where conservation of landscapes and their animal and plant communities are assured. Some of our reserves are large enough to stock large carnivores, such as the lion *Panthera leo*, i.e. Tswalu Kalahari Reserve.

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Dr Duncan MacFadyen

Manager: Research and Conservation
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Tel: +27 11 274 2184
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Cell: +27 83 379 2139

www.oppenheimerproperties.com

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5777
Fax: +27(18) 389 5640
E-mail: [illegible]

Dr D.L Griesel
P O Box 17
Vorstershoop
North West Province
8615

E-mail: dlgriesel@gmail.com
Cell: 083 6302534

Dear Dr Griesel

SUBJECT: CONFIRMATION OF CLASSIFICATION OF YOUR NUUTBEGIN NATURE RESERVE'S LION POPULATION AS WILD MANAGED

1. Chapter 5 of the Lion Biodiversity Management Plan (BMP) published in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) outlines a meta-population plan for Managed Wild Lions (MWL) in South Africa. The plan proposes a national management system composed of linked regional nodes of properties that simulate a meta-population approach whereby different lion groups living on different properties make-up a node's population, i.e. a single population as if these prides were living together.

2. These populations (nodes) should have different vital rates (i.e. births, deaths, dispersal events, colonization etc.), and there should be some occasional dispersal between populations as well as regular movements between properties within nodes; and Implementation of the national management system will thus mimic population and meta-population dynamics, which in-turn would promote genetic diversity and reduce inbreeding risks.

3. On your request, the Department of Rural, Environment and Agricultural Development (READ), extensively conducted verification work in determining the status of lion population on your Nuutbegin Nature Reserve.

4. We have perused various documentations, including those submitted by yourself as well as the affidavit you made under oath, as portfolio of evidence to ascertain the state of wildness of the said population. And, the department has concluded, from all evidence provided and the scientific report compiled, that indeed the lion population on Nuutbegin Game Reserve can be classified as **Wild Managed Lions** as defined in the Lion Biodiversity Management Plan which is nationally mandated.

5. Attached for your perusal is the scientific report compiled which elaborates on the findings. And, any utilization of the said lions must be in accordance with *the guidelines for the implementation of a meta-population management plan for managed lions in South Africa "SA-2017-9-Add1"*, with specific reference to trophy hunting.

We look forward for your participation in the forging of the Kalahari Savanna Node for Wild Managed Lion management.

Yours Sincerely,

MR. M.J. DENGA
DIRECTOR – BIODIVERSITY MANAGEMENT
DATE: 24/04/2018

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka
& Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

DIRECTORATE: BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5568
Cell: 0761982502
E-mail: JPower@nwpg.gov.za

SCIENTIFIC REPORT

SUBJECT : CLASSIFICATION OF NUUTBEGIN NATURE RESERVE LIONS AS A MANAGED WILD POPULATION

19 FEBRUARY 2018

1. BACKGROUND

The Lion (*Panthera leo*) Biodiversity Management Plan (BMP) which was produced in 2015 defined the various categories into which lions are kept and managed in South Africa. These were of three types, firstly, a) captive-bred lions, which are typically kept in small enclosures, and are entirely dependent on humans to provision their food, and they are managed in a highly intensive way, where even their breeding is manipulated for optimal production. Secondly, there are 'managed wild lions', which roam free on fenced in game farms or nature reserves where they are less intensively managed and the lions can sustain themselves from prey they capture, while they can exercise their own choice when it comes to breeding. Thirdly, there are wild lions, which occur in this country only in very large ecosystems, such as the Kgalagadi and Kruger systems. In the North West, the first two categories are applicable.

In 2016 NW READ submitted a list of reserves with details on their area size, population size, and management types to SANBI, so they can be categorised according to the Lion BMP. All four reserves (Madikwe, Pilanesberg, Khamab & Nuutbegin) were assigned to the 'Wild managed lions' category.

The lion population of Nuutbegin Nature Reserve has his grown to about 40 since the introduction of 4 lions in 2012 and hunting is considered to control the population size.

population as the trophies cannot be exported under the CITES source code W, and at present the USA does not allow the import of captive-bred lion trophies (source code C). The Nuutbegin population management adheres to these principles and compliance with US F&WS requirements.

2. PURPOSE

To classify the Nuutbegin Nature Reserve lion population as a wild managed population.

3. DELIBERATIONS

3.1. Nuutbegin acquired 4 lions (2 males/ 2 females) from Tswalu Kalahari Reserve in 2012 (see attached copy of permit no. 648). There are currently about 40 lions on Nuutbegin.

3.2. The founder population of Tswalu was obtained from free roaming lions originating from the Kgalagadi National Park (See attached letters from E. Oppenheimer & Son (PTY) Ltd. dated 16 February 2016 and Zodiac Dierekliniek dated 12 February 2018).

3.3. The lions were let out of the pre-release boma on Nuutbegin 10 weeks after arrival.

3.4. No other lions have been introduced to Nuutbegin NR (affidavit Dr Griesel dated 19 February 2018).

3.5. Nuutbegin is 23 000ha in extent and the lions exclusively live of the free roaming wildlife occurring on the farm.

3.6. The founder population of the lions on Khamab Kalahari Reserve Nuutbegin NR also originated from Tswalu. The Khamab population is classified as managed wild.

4. RECOMMENDATION

BSS hereby confirms that the lion population on Nuutbegin NR is managed as a wild population, with only population management to maintain numbers within the limits of the size of Nuutbegin NR.

.....

Mr Daan Buijs, MSc, *Pr. Sci. Nat.*

Senior Scientist: BSS

19 Feb 2018

.....

Mr Willem Boshoff , MSc, *Pr. Sci. Nat.*

Deputy Director: BSS

19/2/2018

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER

NAME OF ISSUING AUTHORITY	
NAME	DAERD
ADDRESS	JK BUILDING, MARKET STR P.O. BOX 112, VRYBURG 8600
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER			
NAME	DR. DAVID. L	ID NO	3604095013088
SURNAME	GRIESEL	PASSPORT NO	-
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O. Box 17		Nuutbegin
ADDRESS	Vorstershoop		Nature Reserve
ADDRESS	-		-
TOWN	Vorstershoop		Vorstershoop
POSTAL CODE	8615		-
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Dr. D.L Griesel
NAME AND SURNAME RESPONSIBLE PERSON	Dr. D.L Griesel
NAME AND SURNAME OF AGENT	-
PHYSICAL ADDRESS OF FACILITY	Nuutbegin Nature Reserve
PHYSICAL ADDRESS OF FACILITY	Vorstershoop
DISTRICT	Dr. Ruth Segomotsi Mompati
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Transport of 04 Wild Lions From Tswalu Kalahari Reserve (Northern Cape) to Dr. D.L Griesel, Nuutbegin Nature Reserve, Vorstershoop North West Province. Lions to be Kept in Pre-Release Boma's on Nuutbegin

NAME AND SURNAME OF PURCHASER/SELLER	G. van Dyk
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	Tswalu Kalahari Reserve

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM 2012-01-16	TO	2012-02-16
RECEIPT NUMBER	R50.00 Direct Deposit		
K.R KGETSANE			
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP		Department of Agriculture, Conservation, Environment & Rural Development Dr Ruth Segomotsi Mompati District 16-01-2012 Posbus/P.O. Box 112, Vryburg 8600	

VISION PRINTING

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: David Griesel
   a. Years in business: 50+
   b. Name of company conducting hunt: Graceland Safaris
   2. Name of concession: Nuutbegin Size in km²: 250
   a. Land tenure: __ Government lease __ Community __ Private ranch X Private conservancy
   b. Length of concession agreement: For the Period of the Hunt Can it be renewed? X Yes __ No
   c. Length of renewal, if applicable: _____
   d. Estimated total amount received in trophy fees last year, if applicable: $ 300,000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   It has not been obligatory, but due to the reserve opening for hunting, members of the local community have been employed by the reserve to facilitate in hunting, game management and more importantly anti-poaching. They have had problems in the past with Rhino Poaching.
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   S 25° 28.36' E 022°53.79' - Nearest town is Vorstershoop and the Nearest City is Vryburg
   g. If the concession borders a national park, please provide the park name:
   _____
   h. Description of general and distinctive habitat features and any water features:
   As it is in the Kalahari, it is Semi Arid Desert. The Rainfall is low, but the reserve has a very good infrastructure of watering holes by means of a underground well and pumping facilities to keep water throughout the reserve
3. Are there any communities living in the concession? __ Yes __ No
   a. If so, estimated number of people or villages in the concession?
   _____
4. Are there communities bordering this concession? X Yes __ No
   a. If so, estimated number of people or villages around the concession?
   approx 250 on RSA side, Botswana side Unknown, but likely more
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Elephant	None			
Lion	Dense	45+	4 were introduced in 2012	Aerial and land Survey
Leopard	Sparse	3, but mainly nomadic	Down due to the lions	Sightings and tracks
Prey species	Dense	in the 1000's	Down due to the lions	Aerial and land Survey

6. Total employment number: 25

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	1
Trackers	3	2
Anti-poaching scouts/rangers	4	4
Other anti-poaching	4 - Rhino Anti Poaching	4
Cooks/housekeepers	5	
Community coordinators		
Managers	5	5
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: All those that remain Local

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	Year round
Managers	3	3	Year round
Maintenance	6	6	Year round
Road opening/ construction	10	10	Contract based
Community relations personnel	unknown		
Others: _____			

8. Anti-poaching efforts:[2]
   a. Number of anti-poaching staff: 8 but when there is evidence of Rhino Poaching, neighbors an extra community members are called upon for additional assistance
   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both
   c. Months during which anti-poaching patrols are conducted: year round
   d. Number of anti-poaching patrols per month: Daily
   e. Description of anti-poaching equipment, vehicles, etc.: Vehicles, Flashlights and limited firearms
   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The SAPS
   g. Do you offer rewards to poaching informants leading to arrest? x Yes __ No
   h. Do you offer rewards to poaching informants upon conviction? __ Yes __ No
   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ZAR

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	32000	35200	38750	
Equipment	20000	20000	20000	uniforms and gear
Vehicles	300000	300000	300000	repayments on vehicles
Petrol	40000	47000	54000	
Rewards paid		15000	19000	Increase in Rhino Poaching
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		3	7	relating to Rhino

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated			2	
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered			2	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
Medical services and a mobile clinic is run by the reserve for the local community

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: R10000 meat was donated. There is not a program per say, it is based on how much meat is available as a result of trophy hunting

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
There is no wildlife outside of the reserve as they have all been poached and killed by snares.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Graceland Safaris takes care of their staff families in the form of school fees, medical needs and is currently rebuilding homes of a staff member who's home was burnt down

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: Rowan Zen Title: Owner

Graceland Safaris has a strict walk and stalk fair chase policy, and all hunting is done by methods of spot and stalk and track and stalk. We only harvest animals that are past their prime and our company ethos is driven by conservation. As we have several concessions throughout the republic, we do our outmost to not exhaust our natural wildlife heritage and rotate our concessions as often as possible and only take the allocated amount of species and numbers on the concessions as prescribed in the beginning of our seasons. We have our own offsite breeding facility of certain game species to ensure continuing increase in numbers of our wildlife. We have an array of trail cams scattered throughout our concessions for research and census purposes.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

LP NO 142163

Durration of Guiding Commenced 12 / 06 / 2018 Terminated 25 / 06 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	Noth West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Nothern Cape (NC)
				X				

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: ROWAN ZERF
Business Address: 71 15th STREET
MENLO PARK, PTA
Code 0181
I.D. No: 8211075037088
PH Permit No: PH-010/04/2018 NW
Date: _____ Signature _____

CLIENT

Name: Roy EDWARD AGUILAR
Permanent Postal Address (b)(6)
SAN ANTONIO, TX
Code 78260 Country USA
Passport No: (b)(6)
Tel/Fax: (b)(6)
Date: 25/06/2018 Signature (b)(6)

HUNTING OUTFITTERS

Name: ROWAN ZERF
Business Address: 71 15th STREET
MENLO PARK, PTA
Code 0181
I.D. No: 8311075037088
Tel: 0834613451 Fax: _____
PH Permit No: HO-003/04/2018 NW
Date: _____ Signature _____

Farm Name Registration No:	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No:	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
NUUB BEGIN		DAVID GRIESEL	DRSM00374/5/2018	16/06/2018	LION	1		X	SKULL, TAIL, FULL SKIN
DRSM06/06/2016-		NUUBEGIN	NW2812/05/2018						INCL 18 CLAWS
201-203 NW		RO375							
WR04/426/00001		VORSTERSHOP							

Copies: Client Original (White)

1st copy (Pink) Foward to Nature Conservation Authority where hunt took place

Hunter or Outfitter 2nd Copy (Blue) Retain for a period of three years

Professional Hunter Last copy (white) Remains in book

Address to which trophies are to be sent: TBA

Code: _____

Country: _____ Trophy Export Date (Estimate): _____

Biodiversity North West Integrated Permit Ordinary Hunt .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act, Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No.12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974.

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details		Physical Address		Postal Address	
Surname:	Griesel	Building:		P.O Box	17
Full Name:	Dr David	Street:	Rd 375 Vorstershoop to Mokopong	Post Office:	Vorstershoop
Id Number:	3604085013088	Suburb:			
Passport:	N/a	Town:	VORSTERSHOOP	Town:	VORSTERSHOOP
Cell Home:	083630253+ home: 053 939 0100	Area Code:	8615	Postal Code:	8615
Tel Home:	053 939 0100	Division/Region:	Dr Ruth Segomotsi Mompati	District/Region:	Dr Ruth Segomotsi Mompati
Tel Work:	053 939 0100	Province/State:	NW	Province/State:	Nort West Province
Fax Home:	053 939 0101	Country:	South Africa	Country:	South Africa
Email:	dgriesel@gmail.com				

REGION

NorthWest

LOCATION

Facility

Property

Property Name:	NUUTBEGIN NATURE RESERVE
Building:	
Street:	Rd 375 Vorstershoop to Mokopong
Suburb:	VORSTERSHOOP
Town:	VORSTERSHOOP
Area Code:	8615
Division/Region:	VRYBURG
Province/State:	North - West
Country:	South Africa

NATURE CONSERVATION PERMIT OFFICE
NORTH WEST PROVINCE
30 May 2018, 09:05 AM

Stamp of Issuing authority

VALIDITY PERIOD
FROM 29/05/2018 TO 28/07/2018

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority
(Bontle Manganye)
30 May 2018, 09:05 AM

Signature of Permit Holder
(Dr David Griesel)
30 May 2018, 09:05 AM

North West Department of Rural, Environment and Agricultural Development. (READ); Cor. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za

ADDENDUM

PROPERTIES

Name	Town	Province	Country
NUUTBEGIN NATURE RESERVE	VORSTERSHOOP	North - West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Male	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
ROWAN ZERF	PH-010/04/2018 NW	0834513451	

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
ROWAN ZERF	HO-003/04/2018 NW	0834513451	

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
ROY EDWARD AGUILAR	(b)(6)	12/06/2018	25/06/2018	(b)(6) SAN ANTONIO, SAN ANTONIO, 78260, TEXAS, TEXAS, USA

ACTIVITIES

Activity Name
Hunt

(b)(6)

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Directorate Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, is only valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This permit is valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the specified methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This permit is only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signature of the permit holder has been endorsed thereon in ink. 5) The Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permit at any time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt thereto, whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered, lost or destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal, plant or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protected Area, National Park, Provincial Nature Reserve or privately owned land and : - a) the permit holder must beforehand obtain all other relevant written permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this permit, have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized person. 12) An authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this permit, record the required particulars in the space provided therefore or on the annexure or document attached thereto or in the prescribed register related to the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after performing or completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Issuing Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the permit together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as long as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall apply for the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date thereof. 17) Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback report has been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to : - a) all applicable norms and standards in existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to which this permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or changes thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By signing this permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or failure to render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. b) if the permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fees paid to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is used to hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a period of

Signature of Issuing Authority
(Bonno Manganye)
30 May 2018, 09:05 AM

Signature of Permit Holder
(Dr David Griesel)
30 May 2018, 09:05 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za

ADDENDUM

twenty four (24) months prior to the hunting thereof. e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or catch any wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm having a barrel of a caliber of 6,5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch +-.54) to hunt any buffalo, elephant, lion, leopard, rhinoceros, hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written permission as prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as prescribed in applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any hunting organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties assisting the permit holder.

Signature of Issuing Authority
(Bonho Manganye)

30 May 2018, 09:05 AM

Signature of Permit Holder
(Dr David Griesel)

30 May 2018, 09:05 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D
† JAMES G. TEER, PH D
† BART O'GARA, PH D
† DON LINDSAY
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BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J D
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D V M
SHANE MAHONEY
RENEE SNIDER

August 22, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import applications for RSA Wild Managed Lion Trophies for Fredd Williams, Jacob Williams and Edward Aguilar

Dear Chief Cogliano:

Enclosed please find three applications to import "wild managed" lion trophies that were hunted in the Republic of South Africa. Also attached to each permit application is the 2018 Operator Enhancement report from Graceland Safaris, the hunting operator in this instance.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

encl:

- Edward Aguilar's Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Jacob Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Fred Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RSA

Type of Activity Wild Managed Lion

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Williams	Fred	Allen	Jr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room # no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	78261	Bexar	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applican (b)(6) signatures) Date of signature (mm/dd/yyyy)

07/28/2018

to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo, African Lion

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Nuutbegin Nature Reserve, Vorstershoop, North West Providence, South Africa

b. Date wildlife was hunted:

June 12-24, 2018 (Date of harvest June 14,2018)

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Graceland Safaris, Rowan Zerf Outfitter Permit No. HO-003/04/2018NW PH Permit No. PH-010/04/2018NW

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

P&A Hunters cc P.O. Box 332, Bela Bela 0480. Farm 34, Droogekloof, Bela Bela 0480 Republic South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Peter de Villiers
Business Name:	P & A Hunters cc
Address:	PO Box 332 Bela Bela 0480
City:	Farm 34, Droogekloof, Bela Bela 0480
State/Province:	Republic South Africa
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

SEE ATTACHED

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

SEE ATTACHED

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leop

Applicant's signature: (b)(6) Date: 7/28/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9.a. (page 4)

Four Lions were introduced from the Tswalo Reserve in 2012. This has swelled to a current group of over 40 lions. There are no spotted Hyena, Leopard or Cheetah left on the reserve as a result of the lion burden. Since all of the males came from the same family there has been no evidence of the males killing off any of the offspring. The Lioness' are breeding incredible well and the survival rate of the cubs is high due to no other predation threat present.

9.b. (page 4)

The Licenses and trophy fees are allocated to the local government Nature Conservation for wages and salaries to further conserve the species and to give the land owners incentives to continue to conserve the species. The land owner is currently face with an overpopulation situation with his lions and they are having a detrimental effect on other species of wildlife on the reserve. The trophy fees have contributed to the staff salaries on the reserve and a large portion towards the anti-poaching units deployed on the reserve to safeguard the lions against the illegal lion bone trade as well as funding for extra armed security for the help protect the reserve's rhinos from being poached. This hunt was the first lion hunt on the reserve since the lions were introduced in 2012. The need to manage the numbers of lions has become a pressing matter as well as needing to raise funds for the aforementioned rhino anti-poaching unit after seven rhinos were poached last year alone.

9.c. (page 4)

The financial contribution of trophy hunting has provided an opportunity to employ members of the poverty stricken local community surrounding the reserve. In the past, hunger and lack of jobs or income has forced people to cross the border from Botswana side to set snares, traps and poach bush meat to feed their families. Having a reserve like Nuutbegin in the Vorstershoop region has begun to remedy some of these problems as people are now being employed by the local taxidermist, butchery and as camp staff and maintenance crew.
The owner is looking to introduce a new bloodline into the reserve to avoid inbreeding, which is costly. In hunting some of the lions on the reserve it provides him with funding to purchase and translocate lions from another region. Removal of some of the dominate reserve lions will also allow for a better opportunity of survival of the new translocated lions into the reserve.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: FRED A WILLIAMS JR.

Date: 6/28/18

ZODIAC DIEREKLINIEK

Registrasie no: 2003/089560/23 FC12/12051
DR. GS SCHEEPERS BVSc.
31 CAREL DE WET WEG BRITS.
POSBUS 460, BRITS 0250
TEL: 012 252 1266 FAX: 012 252 6357
EMAIL: zdk@vodamail.co.za

12 February 2018

To Whom It May Concern
Veterinary statement

Re: Origen of the Nuutbegin Natuur Reservaal Lions.

I, Gerhardus Scheepers, ID 7404265006087, a veterinarian registration number D99/4295, state that the following information is true and correct as given in the sentences below.

I did the darting and relocation of 4 lions from Tswalo to Nuutbegin in late January 2012. I travelled with them from Tswalo to Nuutbegin and off loaded in the temporary holding boma before being released onto the Reserve.

This all happened between 19 and 22 January 2012. We had to stay a day longer at Tswalo before we could dart and load the lions due to an issue with issuing the permits from North West Nature conservation side.

The darting procedure took place on an afternoon. I darted the female with her two cubs, a male and female, whilst they were feeding on a Blue wildebeest carcass. After being immobilised, a radio collar was fitted to the female and they were loaded into three transport crates and loaded on the back of two vehicles. At the same time Dr Griesel and Gus van Dyk darted the adult male in a different part of Tswalo. He was also fitted with a radio collar, crated and loaded.

We set off at approximately 20h00 from Tswalo on our way to Nuutbegin. Gus and Dylan accompanied us in their own vehicle to Nuutbegin to be with when we off load them. The journey took about 6 hours on road and we off loaded them safe in the holding boma at Nuutbegin.

The morning we inspected them and were happy to see that they are well and no fighting between the male and the cubs. Gys and Dylan were also satisfied and left at about midday on their way back to Tswalo.

These lions have never been bred in a captive facility. They were wild roaming lions originating from the then Kalahari Gemsbok National Park. They are still to this wild and free roaming on Nuutbegin. During 2016 the collars of both the male and female were removed as they stopped working.

Dr G S Scheepers BVSc
D99/4295

ZODIAC DIEREKLINIEK

Registrasie no: 2003/089560/23 FC12/12051
DR. GS SCHEEPERS BVSc.
31 CAREL DE WET WEG BRITS.
POSBUS 460, BRITS 0250
TEL: 012 252 1266 FAX: 012 252 6357
EMAIL: zdc@vodamail.co.za

12 February 2018

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Dr G S Scheepers BVSc
D99/4295

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5777
Fax: +27(18) 389 5640
E-mail: [illegible]

Dr D.L Griesel
P O Box 17
Vorstershoop
North West Province
8615

E-mail: dlgriesel@gmail.com
Cell: 083 6302534

Dear Dr Griesel

SUBJECT: CONFIRMATION OF CLASSIFICATION OF YOUR NUUTBEGIN NATURE RESERVE'S LION POPULATION AS WILD MANAGED

1. Chapter 5 of the Lion Biodiversity Management Plan (BMP) published in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) outlines a meta-population plan for Managed Wild Lions (MWL) in South Africa. The plan proposes a national management system composed of linked regional nodes of properties that simulate a meta-population approach whereby different lion groups living on different properties make-up a node's population, i.e. a single population as if these prides were living together.

2. These populations (nodes) should have different vital rates (i.e. births, deaths, dispersal events, colonization etc.), and there should be some occasional dispersal between populations as well as regular movements between properties within nodes; and Implementation of the national management system will thus mimic population and meta-population dynamics, which in-turn would promote genetic diversity and reduce inbreeding risks.

3. On your request, the Department of Rural, Environment and Agricultural Development (READ), extensively conducted verification work in determining the status of lion population on your Nuutbegin Nature Reserve.

4. We have perused various documentations, including those submitted by yourself as well as the affidavit you made under oath, as portfolio of evidence to ascertain the state of wildness of the said population. And, the department has concluded, from all evidence provided and the scientific report compiled, that indeed the lion population on Nuutbegin Game Reserve can be classified as **Wild Managed Lions** as defined in the Lion Biodiversity Management Plan which is nationally mandated.

5. Attached for your perusal is the scientific report compiled which elaborates on the findings. And, any utilization of the said lions must be in accordance with *the guidelines for the implementation of a meta-population management plan for managed lions in South Africa "SA-2017-9-Add1"*, with specific reference to trophy hunting.

We look forward for your participation in the forging of the Kalahari Savanna Node for Wild Managed Lion management.

Yours Sincerely,

MR. M.J. DENGA
DIRECTOR – BIODIVERSITY MANAGEMENT
DATE: 24.04.2018

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka
& Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

DIRECTORATE: BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5568
Cell: 0761982502
E-mail:JPowell@nwpg.gov.za

SCIENTIFIC REPORT

SUBJECT : CLASSIFICATION OF NUUTBEGIN NATURE RESERVE LIONS AS A MANAGED WILD POPULATION

19 FEBRUARY 2018

1. BACKGROUND

The Lion (*Panthera leo*) Biodiversity Management Plan (BMP) which was produced in 2015 defined the various categories into which lions are kept and managed in South Africa. These were of three types, firstly, a) captive-bred lions, which are typically kept in small enclosures, and are entirely dependent on humans to provision their food, and they are managed in a highly intensive way, where even their breeding is manipulated for optimal production. Secondly, there are 'managed wild lions', which roam free on fenced in game farms or nature reserves where they are less intensively managed and the lions can sustain themselves from prey they capture, while they can exercise their own choice when it comes to breeding. Thirdly, there are wild lions, which occur in this country only in very large ecosystems, such as the Kgalagadi and Kruger systems. In the North West, the first two categories are applicable.

In 2016 NW READ submitted a list of reserves with details on their area size, population size, and management types to SANBI, so they can be categorised according to the Lion BMP. All four reserves (Madikwe, Pilanesberg, Khamab & Nuutbegin) were assigned to the 'Wild managed lions' category.

The lion population of Nuutbegin Nature Reserve has his grown to about 40 since the introduction of 4 lions in 2012 and hunting is considered to control the population size.

population as the trophies cannot be exported under the CITES source code W, and at present the USA does not allow the import of captive-bred lion trophies (source code C). The Nuutbegin population management adheres to these principles and compliance with US F&WS requirements.

2. PURPOSE

To classify the Nuutbegin Nature Reserve lion population as a wild managed population.

3. DELIBERATIONS

3.1. Nuutbegin acquired 4 lions (2 males/ 2 females) from Tswalu Kalahari Reserve in 2012 (see attached copy of permit no. 648). There are currently about 40 lions on Nuutbegin.

3.2. The founder population of Tswalu was obtained from free roaming lions originating from the Kgalagadi National Park (See attached letters from E. Oppenheimer & Son (PTY) Ltd. dated 16 February 2016 and Zodiac Dierekliniek dated 12 February 2018).

3.3. The lions were let out of the pre-release boma on Nuutbegin 10 weeks after arrival.

3.4. No other lions have been introduced to Nuutbegin NR (affidavit Dr Griesel dated 19 February 2018).

3.5. Nuutbegin is 23 000ha in extent and the lions exclusively live of the free roaming wildlife occurring on the farm.

3.6. The founder population of the lions on Khamab Kalahari Reserve Nuutbegin NR also originated from Tswalu. The Khamab population is classified as managed wild.

4. RECOMMENDATION

BSS hereby confirms that the lion population on Nuutbegin NR is managed as a wild population, with only population management to maintain numbers within the limits of the size of Nuutbegin NR.

.....

Mr Daan Buijs, MSc, *Pr. Sci. Nat.*

Senior Scientist: BSS

19 Feb 2018

.....

Mr Willem Boshoff , MSc, *Pr. Sci. Nat.*

Deputy Director: BSS

19/2/2018

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER

NAME OF ISSUING AUTHORITY	
NAME	DACERD
ADDRESS	JK BUILDING, MARKET STR P.O. BOX 112, VRYBURG 8600
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER			
NAME	DR. DAVID. L	ID NO	3604095013088
SURNAME	GRIESEL	PASSPORT NO	-
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O. Box 17		Nuutbegin
ADDRESS	Vorstershoop		Nature Reserve
ADDRESS	-		-
TOWN	Vorstershoop		Vorstershoop
POSTAL CODE	8615		-
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Dr. D.L Griesel
NAME AND SURNAME RESPONSIBLE PERSON	Dr. D.L Griesel
NAME AND SURNAME OF AGENT	-
PHYSICAL ADDRESS OF FACILITY	Nuutbegin Nature Reserve
PH ICAL ADDRESS OF FACILITY	Vorstershoop
DI T	Dr. Ruth Segomotsi Mompati
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Transport of 04 Wild Lions From Tswalu Kalahari Reserve (Northern Cape) to Dr. D.L Griesel, Nuutbegin Nature Reserve, Vorstershoop North West Province. Lions to be Kept in Pre-Release Boma's on Nuutbegin

NAME AND SURNAME OF ~~PURCHASER~~ SELLER	G. van Dyk
RESIDENTIAL ADDRESS OF ~~PURCHASER~~ SELLER	Tswalu Kalahari Reserve

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM 2012-01-16	TO	2012-02-16
RECEIPT NUMBER	R50-00 Direct Deposit		
K.R KGETSANE			
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP		Department of Agriculture, Conservation, Environment & Rural Development Dr Ruth Segomotsi Mompati District 16-01-2012 Postbus/P.O. Box 112, Vryburg 8600	

VISION PRESS TEL

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

LP NO! 42162

Durration of Guiding Commenced 12 / 06 / 2018 Terminated 25 / 06 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	Noth West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Nothern Cape (NC)
				X				

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: ROWAN ZERF
Business Address: 71 15th Street
Menlo Park, PTA
Code 0181
I.D. No: 8811075037088
PH Permit No: PH-010/04/2018 NW
Date: 25/06/2018 Signature

CLIENT

Name: FRED A williams
Permanent Postal Address: [redacted] (9)(a)
SAN ANTON
Code 78201 Country USA
Passport No: [redacted] (9)(a)
Tel/Fax: T/ [redacted]
Date: 25/06/2018 Signature [redacted] (9)(a)

HUNTING OUTFITTERS

Name: ROWAN ZERF
Business Address: 71 15th Street
Menlo Park, PTA
Code 0181
I.D. No: 8811075037088
Tel: 0834513451 Fax:
PH Permit No: HO-003/04/2018 NW
Date: 25/06/2018 Signature

Farm Name Registration No:	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No:	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
NWUBEGIN	VRYBURG	DAVID GRIESEL	DRSM003375/5/	14/06/2018	LION	1		X	SKULL, JAW Full SKIN INCL 18 Claws
DRSM06/06/2016-201		NWUBEGIN	2018						
203 NW		RO375	NW2813/05/2018						
WR04/420/00001		VORSTERSHAP							

Copies: Client Original (White)

1st copy (Pink) Foward to Nature Conservation Authority where hunt took place

Hunter Outfitter 2nd Copy (Blue) Retain for a period of three years

Professional Hunter Last copy (white) Remains in book

Address to which trophies are to be sent: TBC

Code:

Country: Trophy Export Date (Estimate):

3.

Biodiversity North West Integrated Permit Ordinary Hunt .375 Caliber

Hunt Dangerous Game

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No.12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details		Physical Address		Postal Address	
Surname:	Griesel	Building:		P O Box:	17
Full Name:	Dr David	Street:	Rd 375 Vorstershoop to Makoppng	Post Office:	Vorstershoop
Id Number:	3604095013088	Suburb:			
Passport:	N/a	Town:	VORSTERSHOOP	Town:	VORSTERSHOOP
Cell Home:	0836302534 home: 053 939 0100	Area Code:	8615	Postal Code:	8615
Tel Home:	053 939 0100	Division/Region:	Dr Ruth Segomotsi Mompati	District/Region:	Dr Ruth Segomots Mompati
Tel Work:	053 939 0100	Province/State:	NW	Province/State:	Nort West Provinc
Fax Home:	053 939 0101	Country:	South Africa	Country:	South Africa
Email:	dlgriesel@gmail.com				

REGION

NorthWest

LOCATION

Facility

Property
Property Name: MUUTBEGIN NATURE RESERVE
Building:
Street: Rd 375 Vorstershoop to Makoprong
Suburb: VORSTERSHOOP
Town: VORSTERSHOOP
Area Code: 8615
Division/Region: VRYBURG
Province/State: North - West
Country: South Africa

NATURE CONSERVATION PERMIT OFFICE
NORTH WEST PROVINCE
30 May 2018, 09:38 AM

Stamp of Issuing Authority

VALIDITY PERIOD

FROM 29/05/2018 TO 28/07/2018

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority
(Sorho Nanganye)
30 May 2018, 09:38 AM

Signature of Permit Holder
(Dr David Griesel)
30 May 2018, 09:38 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, P
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

DRSM 00375/5/2018 NW 2813/05/2018 Application ID 2813

ADDENDUM

PROPERTIES

Name	Town	Province	Country
NUUTBEGIN NATURE RESERVE	VORSTERSHOOP	North - West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Male	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
ROWAN ZERF	PH-010/04/2018 NW	0834513451	

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
ROWAN ZERF	HO-003/04/2018 NW	0834513451	

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
FRED ALLEN JR WILLIAMS	(b)(6)	17/06/2018	25/06/2018	(b)(6) SAN ANTONIO, SAN ANTONIO, 78261, SAN ANTONIO, TEXAS, U

ACTIVITIES

Activity Name
Hunt

(b)(6)

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief D: Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the sign the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permi time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any anim or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protecte National Park, Provincial Nature Reserve or privately owned land and : - a) the permit holder must beforehand obtain all other relevant permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the lru landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized 12) An authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register re the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after perfor completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall a the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date then Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback rep been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to : - a) all applicable norms and stan existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to wh permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or c thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to the permit. 20) By signi permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or fa render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. I permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fe to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (375 of an inch H&H) is used to hunt elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a pe

Signature of Issuing Authority
(Bertha Mangamye)

30 May 2018, 09:38 AM

Signature of Permit Hold
(Dr David Grisel)

30 May 2018, 09:38 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, M
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenge@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

twenty four (24) months prior to the hunting thereof, e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present. f) Any official who attends the hunt has the full right to defend himself / herself as well anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or ra wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm h barrel of a caliber of 6.5 mm (256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the re activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhin hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written permis prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as presc applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild ani / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impos distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such or hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties a the permit holder

Signature of Issuing Authority
(Bortho Manganye)

30 May 2018, 09:38 AM

Signature of Permit Hol
(Dr David Griesel)

30 May 2018, 09:38 AI

North West Department of Rural, Environment and Agricultural Development. (READ), Cor. Dr. James Moroka Drive & Stadium Road, P
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdeage@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: David Griesel
   a. Years in business: 50+
   b. Name of company conducting hunt: Graceland Safaris
   2. Name of concession: Nuutbegin Size in km²: 250
   a. Land tenure: __ Government lease __ Community __ Private ranch _x_ Private conservancy
   b. Length of concession agreement: For the Period of the Hunt Can it be renewed? _x_ Yes __ No
   c. Length of renewal, if applicable: _____
   d. Estimated total amount received in trophy fees last year, if applicable: $ 300,000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   It has not been obligatory, but due to the reserve opening for hunting, members of the local community have been employed by the reserve to facilitate in hunting, game management and more importantly anti-poaching. They have had problems in the past with Rhino Poaching.
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   S 25° 28.36' E 022°53.79' - Nearest town is Vorsterhoop and the Nearest City is Vryburg
   g. If the concession borders a national park, please provide the park name: _____
   h. Description of general and distinctive habitat features and any water features:
   As it is in the Kalahari, it is Semi Arid Desert. The Rainfall is low, but the reserve has a very good infrastructure of watering holes by means of a underground well and pumping facilities to keep water throughout the reserve

3. Are there any communities living in the concession? __ Yes __ No
   a. If so, estimated number of people or villages in the concession? _____
4. Are there communities bordering this concession? _x_ Yes __ No
   a. If so, estimated number of people or villages around the concession?
   approx 250 on RSA side, Botswana side Unknown, but likely more
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Elephant	None			
Lion	Dense	45+	4 were introduced in 2012	Aerial and land Survey
Leopard	Sparse	3, but mainly nomadic	Down due to the lions	Sightings and tracks
Prey species	Dense	in the 1000's	Down due to the lions	Aerial and land Survey

6. Total employment number: 25

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	1
Trackers	3	2
Anti-poaching scouts/rangers	4	4
Other anti-poaching	4 - Rhino Anti Poaching	4
Cooks/housekeepers	5	
Community coordinators		
Managers	5	5
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: All those that remain Local

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	Year round
Managers	3	3	Year round
Maintenance	6	6	Year round
Road opening/ construction	10	10	Contract based
Community relations personnel	unknown		
Others: _____			

8. Anti-poaching efforts:[2]
   a. Number of anti-poaching staff: 8 but when there is evidence of Rhino Poaching, neighbors an extra community members are called upon for additional assistance
   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both
   c. Months during which anti-poaching patrols are conducted: year round
   d. Number of anti-poaching patrols per month: Daily
   e. Description of anti-poaching equipment, vehicles, etc.: Vehicles, Flashlights and limited firearms
   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The SAPS
   g. Do you offer rewards to poaching informants leading to arrest? x Yes __ No
   h. Do you offer rewards to poaching informants upon conviction? __ Yes __ No
   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ZAR

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	32000	35200	38750	
Equipment	20000	20000	20000	uniforms and gear
Vehicles	300000	300000	300000	repayments on vehicles
Petrol	40000	47000	54000	
Rewards paid		15000	19000	Increase in Rhino Poaching
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		3	7	relating to Rhino

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated			2	
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered			2	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
Medical services and a mobile clinic is run by the reserve for the local community

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: R10000 meat was donated. There is not a program per say, it is based on how much meat is available as a result of trophy hunting

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
There is no wildlife outside of the reserve as they have all been poached and killed by snares.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Graceland Safaris takes care of their staff families in the form of school fees, medical needs and is currently rebuilding homes of a staff member who's home was burnt down

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: Rowan Zen Title: Owner

Graceland Safaris has a strict walk and stalk fair chase policy, and all hunting is done by methods of spot and stalk and track and stalk. We only harvest animals that are past their prime and our company ethos is driven by conservation. As we have several concessions throughout the republic, we do our outmost to not exhaust our natural wildlife heritage and rotate our concessions as often as possible and only take the allocated amount of species and numbers on the concessions as prescribed in the beginning of our seasons. We have our own offsite breeding facility of certain game species to ensure continuing increase in numbers of our wildlife. We have an array of trail cams scattered throughout our concessions for research and census purposes.

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] Lion permits

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Tue, Sep 10, 2019 at 9:57 AM
To: "Fred Williams, DVM" [redacted]
Bcc: emma_nelson@fws.gov

Good morning Mr. Williams,

The U.S. Fish and Wildlife Service International Affairs Program works to conserve our nation's wildlife and species of international concern. In order to provide our best customer service, we are currently focusing on processing permit applications and are not providing status updates on permit applications at this time. Once you receive your acknowledgement e-mail indicating your application number, please allow us time to evaluate your application. If we need additional information, we will contact you.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Mon, Sep 9, 2019 at 2:19 PM Fred Williams, [redacted] wrote:

> To whom it may concern,
>
> I am checking into the progress on the permits No 04680D (Jacob Williams) and permit No 04696D (Fred Williams). These were submitted for evaluation a year ago and I have had no further contact from USFW since confirmation that the application packets were received. Can you please give me an update on where we are at in the process.
>
> Thank you
>
> Fred Willimas

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD AUG 31 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Burris	Dana	Robinson	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)

(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tucson	Arizona	85737	Pima	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the d I certify that the information submitted in this application for a permit is complete and y false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

08/22/2018

Signatu tamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same address as listed in page 1. Self-addressed, pre-paid envelope included herewith.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   D. Rob Burris, 520-289-7070, drb1026@gmail.com

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo; African Lion

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Mozambique; Niassa province; Niassa Reserve Hunting Block R2; nearest city is Lichinga, Mozambique

b. Date wildlife is to be hunted:

October 26, 2018 - November 7, 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Niassa Hunter Safaris LDA; Jorge Carrico, Professional Hunter & Outfitter

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

N/A

b. Date wildlife was hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Hunt not yet completed; permits and/or licenses no currently in my possession

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Life Form Taxidermy CC
Address:	No. 7 Aluminium Road, P.O. Box 763
City:	White River
State/Province:	MPumalanga 1240
Country, Postal Code:	South Africa

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

No.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Approximate fees are $40,000 USD; It is my understanding that some percentage of those fees goes to the local communities in the Niassa province. It is also my understanding that some portion of those fees goes to the Niassa Reserve for conservation and anti-poaching efforts.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Niassa Hunter Safaris is actively engaged in wildlife conservation and anti-poaching efforts year-round in its hunting concession. Fees paid to NHS are used to pay for such efforts.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: (b)(6) Date: 08/22/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Re: [EXTERNAL] CITES Application ID No. PRT-05661D

Management Authority, FWHQ <ManagementAuthority@fws.gov>
Fri 7/31/2020 9:25 AM
To: (b)(6) [redacted]

Good morning Mr. Burris,

Thank you for your inquiry. Your applicaon, #05661D , that was received on August 31, 2018, is currently under review. Please be aware that we have a significant number of applicaons pending , and we process applicaons in the or der they are received in the office. If there is a need for addional informaon or clarific aon on in formaon pr ovided in your applicaon, the s taff member working on your applicaon will c ontact you directly.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service informed the public that it was revising its procedure for assessing applicaons t o import certain sport-hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries. In their place, we are making findings for trophy imports on an applicaon-b y-applicaon basis.

The Service is connuing t o monitor the status and management of these species in their range countries. We will review each applicaon r eceived for import of sport-hunted trophies and evaluate the informaon pr ovided in the applicaon as w ell as other informaon a vailable to us regarding the status and management of the species to ensure that the hunng pr ogram is promong the c onservaon of the species. Each applicaon mus t also meet all other applicable perming r equirements before it may be authorized. We process each permit that comes in, however somemes r eceipt and review of cric al informaon c an take me, parcularly with addional in formaon w e have received from range countries.

We appreciate your me and c onsideraon.

****
U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
Reply to: ManagementAuthority@fws.gov
http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
****
New mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
MS: IA
5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From: rob@burrismacomber.com <Rob@burrismacomber.com>
Sent: Thursday, July 30, 2020 4:26 PM

To: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Subject: [EXTERNAL] CITES Applicaon ID No. PR T-05661D

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi, I am following up on the status of my pending CITES application. Can you provide any update?

Your continued courtesies are appreciated.

Sincerely,

D. Rob Burris

CONFIDENTIALITY NOTICE: This transmission is intended to be confidential and may be subject to attorney-client privilege. If you receive this transmission in error, please click on reply and notify the sender. Thank You.

To learn more about (b)(6)

***NOTE**: If you are a client, do not forward this email to anyone. Doing so may cause you to waive the attorney-client privilege.*

From: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Sent: Thursday, March 12, 2020 4:45 AM
To (b)(6)
Subject: Re: [EXTERNAL] RE: Applicaon ID No. PR T-05661D

Dear Mr. Burris,

We understand your concerns and appreciate your paence. Y our applicaon is s ll under r eview and you do not need to re-submit an applicaon. W e will contact you if we have any quesons r egarding your applicaon. Thank y ou for your me.

****
U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
Reply to: ManagementAuthority@fws.gov
http://www.fws.gov/international/permits/

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

****

New mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
MS: IA
5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From: (b)(6)
Sent: Wednesday, March 11, 2020 1:07 PM
To: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Subject: [EXTERNAL] RE: Applicaon ID No. PR T-05661D

Thank you for the response. However, can you at least confirm that my application is still pending? After nearly 18 months, I am starting to think that maybe my application was lost and/or that I need to re-apply. Any information is helpful and appreciated. Thanks.

Sincerely,

D. Rob Burris

(b)(6)

CONFIDENTIALITY NOTICE: This transmission is intended to be confidential and may be subject to attorney-client privilege. If you receive this transmission in error, please click on reply and notify the sender. Thank You.

To learn more about (b)(6)

***NOTE**: If you are a client, do not forward this email to anyone. Doing so may cause you to waive the attorney-client privilege.*

From: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Sent: Wednesday, March 11, 2020 6:20 AM
To: (b)(6)
Subject: Re: Applicaon ID No. PR T-05661D

Good morning Mr. Burris,

The U.S. Fish and Wildlife Service International Affairs Program works to conserve our nation's wildlife and species of international concern. In order to provide our best customer service, we are currently focusing on processing permit applications and are not providing status updates on permit applications at this time. Once you receive your acknowledgement e-mail indicating your application number, please allow us time to evaluate your application. If we need additional information, we will contact you. If you need to add information to your file, send

information to managementauthority@fws.gov and include your PRT number in the subject line. For all other inquiries, please email managementauthority@fws.gov.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
Reply to: ManagementAuthority@fws.gov
http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

****

New mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
MS: IA
5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From (b)(6) [redacted]
Sent:
To: Braxton, Ailteas <ailteas_braxton@fws.gov>; Moore, Kathleen <kathleen_moore@fws.gov>
Cc: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Subject: Applicaon ID No. PR T-05661D

Hi, I am writing to check on the status of my lion CITES application. I summitted the application in August 2018. Is my application still pending? Do I need to re-apply? I really don't have any information on where things stand or what I can do to assist. Any information that you can provide is much appreciated.

I look forward to your response. Thanks!

Sincerely,

D. Rob Burris

(b)(6) [redacted]

RCVD SEP 6 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Jayo	Douglas	(MMN)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b)(6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Boise	Idaho	83709	Ada	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and [redacted] understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 8-27-18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   N.A.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Doug Joyo
   208-322-3663 office
   doug@joyoconstruction.com

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo melanochaita

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:
   Zambia, Nyakolwe Game Management Area
   Petauke (nearest town)

   b. Date wildlife was hunted:
   23 June 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
Sable Transport/Sydney Kundu

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:
Bangweulu Taxidermy Ltd. Plot 4442/K, Chifwemo Road, New Kasamo, Lusaka, Zambia

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name: see item d above
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
NO

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
See #4,200 No I don't

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
NO

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: [redacted] Date: 8-27-18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0000556

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 04/06/2018 .....

DETAILS OF PERMIT HOLDER

Full name: Douglas Jayo ..... NRC/Passport No.: (b)(6)

Tel/Mobile No.:..... E-mail address.....

Postal Address: Safe Transport ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 4926 ..... 2. ..... 3.....

Calibre(s) 1.: 46 ..... 2. 30.06 ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No. 0000796 .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in Nyakolwa G.R ..... Game Management Area,

As Above ..... Hunting block for ..... days from 14/06/18

06/07/18 ..... (Dates inclusive)

Amount Paid [illegible] ..... GRZ Receipt No. 0042739

DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
- 4 JUN 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

NPW FORM 12

ORIGINAL

0000402

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: SYDNEY KUNDA NRC/Passport No. 278918/66/1

Residential Address: CHIEF KAKUMBA PALACE MFUWE

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: SABLE TRANSPORT

DETAILS OF CLIENT

Name of client: DOUGLAS TAYLOR NRC/Passport No: (b)(6)

Tel/Mobile No..... Nationality: AMERICAN

Postal Address: SABLE TRANSPORT Residential Address: USA

Type of Licence: CLASS A Licence No.: 00005556

Date of Issue:..... Place of Issue: CHILANGA

Name of Hunting Block where hunting was conducted: NYAKOLWE GAME

Hunting period From: 15/06/18 To: 06/07/18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
20/06/18	PUKU	M	ONE	NIL	S1358255 E0305436	✓		[illegible]
23/06/18	LION	M	ONE	NIL	S1358255 E0605708	✓		[illegible]
25/06/18	BUFFALO	M	ONE	NIL	S1341991 E0305911	✓		[illegible]

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
PUKU			15"	
LION				
BUFFALO			39½"	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 05/07/18 Signature of Client (b)(6)

Date 05/07/18 Signature of Professional Hunter

Date 05/07/18 Name of Wildlife Police Officer RICHARD SONDAYI

Employment No. of W.P.O. 277497

Signature of W.P.O

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Original

NPW FORM 2

S/No. 0000371

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 06/6/18

DETAILS OF LICENSEE

Full Name: DOPGLAS TIAYO NRC No./Passport No.: H9978146 3

Nationality: AMERICAN Age: 72 YEARS

Tel/Mobile No: E-mail

Full Name of Safari Company: Sable Transport

Certificate of Incorporation No. Date of Incorporation

Postal Address: P1B 219 W Residential Address: USA

Firearm Licence/Tourist Firearm Import No.: H92C Calibre of Firearm: H6

Type of Hunt: CLASSICAL

Any other relevant information, which may be considered in support of this application (e.g. previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1ST	M	Kyalotwa Game	2018	4200
/			Ranch		

Total Animals fees paid - the kwacha equivalent of US$ 4200

Concession Fees paid - the kwacha equivalent of US$ -

Grand Total the kwacha equivalent of US$ 4200

K/Med 23/6/18

Official Stamp

Chairperson of the Committee

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
-6 JUN 2018
LICENSING
PRIVATE BAG 1 CHILANGA ZAMBIA

Im0000306
Ref 0043539

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Vargas, Darcy <darcy_vargas@fws.gov> Wed, Nov 21, 2018 at 10:40 AM
To: [redacted]

Dear Mr. Jayo,

Your application, # 06121D, that was received on September 6, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. If there is a need for additional information or clarification on information provided in your application, you will contact you directly.

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Mon, Nov 19, 2018 at 12:37 PM
Subject: Cites application # 06121D
To: Vargas, Darcy <darcy_vargas@fws.gov>
[Quoted text hidden]

181116122808_0001.pdf
187K

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Jodie Mogensen (b)(6) Mon, Nov 26, 2018 at 1:01 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Darcy,

Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.

Sincerely,

Doug

Douglas Jayo

President

Jayo Development, Inc

(b)(6)

(b)(6)

ASE INCLUDE: (b)(6)

and (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: (b)(6)
Subject: Fwd: Cites application # 06121D

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Jodie Mogensen [redacted] Mon, Nov 26, 2018 at 1:01 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Darcy,

Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.

Sincerely,

Doug

Douglas Jayo

President

[redacted]

[redacted]

LEASE INCLUDE: [redacted]

and [redacted]

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: [redacted]
Subject: Fwd: Cites application # 06121D

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Jodie Mogenser(b)(6) Mon, Dec 17, 2018 at 11:41 AM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Hello Darcy,

Please give me an up date on the status of my permit. I know it was forwarded to you supervisor per you last email. Have you by chance heard anything more?

Thank you,

Doug

Douglas Jayo

(b)(6)

(b)(6)

LEASE INCLUDE: (b)(6)

and (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Monday, December 3, 2018 1:42 PM
To:(b)(6)
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Vargas, Darcy <darcy_vargas@fws.gov> Wed, Dec 19, 2018 at 4:30 PM
To: Jodie Mogensen <(b)(6)
Bcc: Anna Barry <anna_barry@fws.gov>

Dear Mr. Jayo,

Ref: 06121D

Your referenced application is still under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] Recall: Cities application # 06121D

Jodie Mogensen (b)(6) Mon, Jan 21, 2019 at 12:13 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Jodie Mogensen would like to recall the message, "Cities application # 06121D".

winmail.dat
2K

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] RE: Cities application # 06121D

Vargas, Darcy <darcy_vargas@fws.gov> Tue, Jan 29, 2019 at 10:04 AM
To: Jodie Mogensen (b)(6)
Cc: Anna Barry <anna_barry@fws.gov>

Dear Doug,

My supervisor's name is Anna Barry. She is copied on this email and she can be reached directly at 703-358-1976.

At this time, we are still assessing the effects of the furlough on this office and applications are being reviewed as quickly as possible in the order received.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
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On Mon, Jan 21, 2019 at 12:11 PM Jodie Mogensen (b)(6) wrote:

> Hello Darcy,
>
> Cam you give me a status update on my cities permit application # 06121D or give me your supervisors email address, please?
>
> Thank you,
>
> Doug
>
> *Douglas Jayo*
> (b)(6)

(b)(6)

Boise, ID 83709

(b)(6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b)(6)

and (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, December 19, 2018 2:30 PM
To: Jodie Mogensen <(b)(6)
Subject: Re: [EXTERN 21D

Dear Mr. Jayo,

Ref: 06121D

Your referenced application is still under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Dec 17, 2018 at 11:41 AM Jodie Mogensen (b)(6) rote:

Hello Darcy,

Please give me an up date on the status of my permit. I know it was forwarded to you supervisor per you last email. Have you by chance heard anything more?

Thank you,

Doug

Douglas Jayo

(b)(6)

(b)(6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE:

and (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Monday, December 3, 2018 1:42 PM
To (b)(6)
Su tes application # 06121D

Dear Mr. Jayo,

Ref: 06121D

An updated status of your referenced application is that the initial review has been completed and the application has been passed on to my supervisor for her review and decision.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Nov 26, 2018 at 1:01 PM Jodie Mogensen (b)(6) rote:

> Darcy,
>
> Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.
>
> Sincerely,
>
> Doug
>
> *Douglas Jayo*

(b)(6)
Boise, ID 83709
(b)(6)
(b)(6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b)(6)

and (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: (b)(6)
Sub # 06121D

Dear Mr. Jayo,

Your application, # 06121D, that was received on September 6, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. If there is a need for additional information or clarification on information provided in your application, you will contact you directly.

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

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www.cites.org

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Mon, Nov 19, 2018 at 12:37 PM
Subject: Cites application # 06121D
To: Vargas, Darcy <darcy_vargas@fws.gov>

Darcy,

Could you give them the status of the application.

Thanks,

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Jodie Mogensen** <jodie@jayoconstruction.com>
Date: Mon, Nov 19, 2018 at 11:59 AM
Subject: [EXTERNAL] FW: Cites application # 06121D
To: <anna_barry@fws.gov>

Hello Anna,

Please see the email I sent Darcy copied below… I haven't heard back from Darcy, can you please update me on the progress of my application?

Thanks!

Doug

Douglas Jayo
(b)(6)
Boise, ID 83709
(b)(6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE:(b)(6)
and (b)(6)

From: Jodie Mogensen (b)(6)
Sent: Friday, November 16, 2018 12:45 PM
To: 'darcy_vargas@fws.gov' <darcy_vargas@fws.gov>
Subject: Cites application # 06121D

Hello Darcy,

I am inquiring about the status of my cites permit # 06121D which was submitted on August 27, 2018. I did talk to you to get information prior to the submittal. Can you please advise when it will be issued? In case you are not the person I need to ask, could you help me with whom I should be asking? There is a copy or my Cites application attached for your convenience.

Thank you,

Doug Jayo

Douglas Jayo

(b)(6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b)(6)

and (b)(6)

Barry, Anna <anna_barry@fws.gov>

Cities application # 06121D

Barry, Anna <anna_barry@fws.gov> Wed, Jan 30, 2019 at 5:05 PM
To: Jodie Mogensen (b)(6)
Cc: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Mr. Doug Jayo,

Due to the Government being shutdown for 35 days we are assessing the processing of work within the office. We will contact you as soon as we can regarding your application status.

Also, please be aware that in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it was revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we make findings for trophy imports on an application-by-application basis. This new procedure has increase the time-frame for finalizing these types of applications.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

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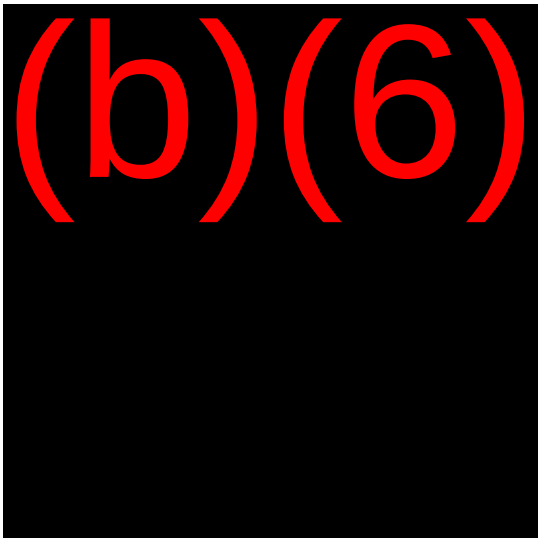
On Wed, Jan 30, 2019 at 1:07 PM Jodie Mogensen (b)(6) wrote:

> Hello Anna,
>
> Can you give me an estimate on my cities permit application time frame please? My African exporter is asking me.
>
> Sincerely,

Doug

Douglas Jayo



ON ALL FUTURE CORRESPONDENCE PLEASE EMAIL: (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Tuesday, January 29, 2019 8:05 AM
To: Jodie Mogensen (b)(6)
Cc: Anna Barry <anna_barry@fws.gov>
Subject: Re: [EXTERNAL] RE: Cities application # 06121D

Dear Doug,

My supervisor's name is Anna Barry. She is copied on this email and she can be reached directly at 703-358-1976.

At this time, we are still assessing the effects of the furlough on this office and applications are being reviewed as quickly as possible in the order received.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

On Mon, Jan 21, 2019 at 12:11 PM Jodie Mogensen (b)(6) wrote:

> Hello Darcy,
>
> Cam you give me a status update on my cities permit application # 06121D or give me your supervisors email address, please?
>
> Thank you,
>
> Doug
>
> *Douglas Jayo*
>
> (b)(6)
>
> **ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE:** (b)(6)
>
> **and** (b)(6)
>
> **From:** Vargas, Darcy <darcy_vargas@fws.gov>
> **Sent:** Wednesday, December 19, 2018 2:30 PM

To: Jodie Mogensen (b)(6)
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Ref: 06121D

Your referenced application is still under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Dec 17, 2018 at 11:41 AM Jodie Mogensen (b)(6) wrote:

> Hello Darcy,
>
> Please give me an up date on the status of my permit. I know it was forwarded to you supervisor per you last email. Have you by chance heard anything more?
>
> Thank you,
>
> Doug

Douglas Jayo

(b)(6)

office

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b)(6)

and

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Monday, December 3, 2018 1:42 PM
To: (b)(6)
Subject: Cites application # 06121D

Dear Mr. Jayo,

Ref: 06121D

An updated status of your referenced application is that the initial review has been completed and the application has been passed on to my supervisor for her review and decision.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Nov 26, 2018 at 1:01 PM Jodie Mogensen (b)(6) wrote:

> Darcy,
>
> Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.
>
> Sincerely,
>
> Doug
>
> *Douglas Jayo*
>
> (b)(6)
>
> **ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE:** (b)(6)
>
> **and** (b)(6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: (b)(6) [redacted]
Subject: Fwd: Cites application # 06121D

Dear Mr. Jayo,

Your application, # 06121D, that was received on September 6, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. If there is a need for additional information or clarification on information provided in your application, you will contact you directly.

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Mon, Nov 19, 2018 at 12:37 PM
Subject: Cites application # 06121D
To: Vargas, Darcy <darcy_vargas@fws.gov>

Darcy,

Could you give them the status of the application.

Thanks,

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

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---------- Forwarded message ---------
From: **Jodie Mogensen** <jodie@jayoconstruction.com>
Date: Mon, Nov 19, 2018 at 11:59 AM
Subject: [EXTERNAL] FW: Cites application # 06121D
To: <anna_barry@fws.gov>

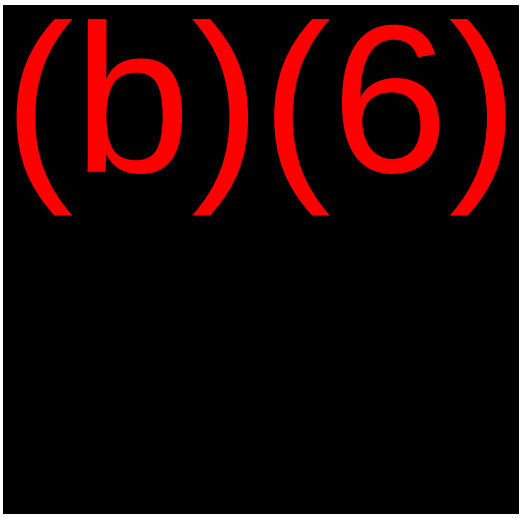
Hello Anna,

Please see the email I sent Darcy copied below… I haven't heard back from Darcy, can you please update me on the progress of my application?

Thanks!

Doug

Douglas Jayo



ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b)(6)

and (b)(6)

From: Jodie Mogensen <(b)(6)
Sent: Friday, November
To: 'darcy_vargas@fws.gov' <darcy_vargas@fws.gov>
Subject: Cites application # 06121D

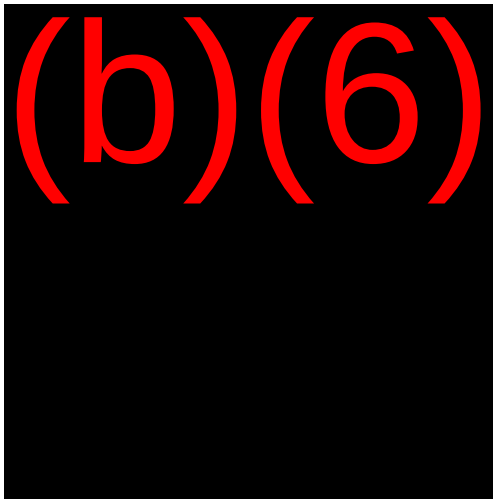
Hello Darcy,

I am inquiring about the status of my cites permit # 06121D which was submitted on August 27, 2018. I did talk to you to get information prior to the submittal. Can you please advise when it will be issued? In case you are not the person I need to ask, could you help me with whom I should be asking? There is a copy or my Cites application attached for your convenience.

Thank you,

Doug Jayo

Douglas Jayo



ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b)(6)

and (b)(6)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

March 5, 2019

In Reply Refer To:
FWS/AIA/DMA/PRT-06121D

Enhancement Finding
Applicant: Douglas Jayo (PRT-06121D)

Douglas Jayo submitted an application on September 6, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Nyakolwe Game Management Area (GMA), near Petauke Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken June 23, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the

prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Jayo's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Nyakolwe GMA, near Petauke, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Nyakolwe GMA, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Jayo's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Jayo's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Jayo's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Jayo's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Jayo will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Jayo, in managing the lion populations in GMAs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Jayo.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Douglas Jayo.**

Darcy Vargas

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 3/3/19

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA06121D-0
Effective: 03/05/2019 Expires: 03/04/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
DOUGLAS JAYO
(b)(6) [redacted]
BOISE, ID 83709
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of Zambia.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD SEP 06 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Fife	Brian	Keith	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Las Vegas	Nevada	89131	Clark	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6) 08/17/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Brian K. Fife, (b)(6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Scientific name: Panthera leo melanochaita Common name: African Lion (South African Cape Lion)

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

NA

b. Date wildlife is to be hunted:

NA

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

NA

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Kalahari Desert, Northwest Province, South Africa, GPS coordinates: 25 47' 23.57" S 22 48' 41.74" E
Farm Aurora, nearest city is Vorstershoop, South Africa Code: 8615

b. Date wildlife was hunted:

June 17, 2017 to June 19, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Professional Hunter: GG Van Schalkwyk with CMP Safaris

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Marakalalo Taxidermy (Trophies), 21 Storm Avenue, Bainsvelei; Bloemfontein; Free State, South Africa
PO Box 37268, Langenhovenpark, South Africa 9330

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
Attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name: J. Kruger Human
Business Name: Marakalalo Trophies (Taxidermy)
Address: 21 Storm Avenue, Bainsvlei
City: Bloemfontein
State/Province: Freestate
Country, Postal Code: South Africa 9330

(POBox 37268
Langenhoven Park, Bloemfontein
South Africa, 9330)

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

According to IUCN Red list in South Africa the African Lion population has increased 29% since 1993 and hit capacity or over capacity by 2013. Please see attached for more information.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

$10,000 to CMP Safaris in addition to the production of marketing material and video, $1,000 to professional hunter, $600 to main tracker, $400 to assistant tracker, $80-$200 each to camp staff(cooks, driver, housekeeper, skinners). Portion of funds feeds young children. Please see attached.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CMP Safaris helps the government track down poachers of wild lions. They also provide funds to aid lions that are starving in some areas of Africa. They have released captive bred lions into the wild with success. Please see attached.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than [redacted] one calendar year.

Applicant's signature: (b)(6) Date: 08/17/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Los Angeles, CA
370 Amapola Ave. #114
Torrance, CA 90501
Phone: (310) 328-6307 Fax (310) 328-6399
fwsole_lax@fws.gov

(or (if necessary)
San Francisco, CA
1633 old Bayshore Hwy, Suite 248
Burlingame, CA 94010)

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

According to the International Union for the Conservation of Nature (IUCN) Red List, in South Africa the African Lion population has increased 29% since 1993 and has reached the carrying capacity or over capacity by 2013.[16] Although listed as "vulnerable" in most areas, with regards to South Africa, the African lion will be listed as "least concern" on the national Red List.[16] This does not even count the nearly 7,000 captive bred lions in South Africa. As captive bred lions are not counted in population numbers for IUCN, CITES or the USFWS. According to *Baeur et al, 2015*, "South African populations do not indicate such a drastic and widespread decline… Fenced populations reveal a completely different pattern: none of them experienced a sharp decline, and many small fenced populations are increasing" [1]. Nearly all wild-lion hunting areas in South Africa are well managed and protected by fencing. *South Africa's Department of Environmental Affairs Biodiversity Management Plan for the African Lion (Panthera Leo) released in 2015* notes South Africa's lion populations have not only stabilized but are increasing – by 30 percent over the last three decades. "Because all lions in South Africa are within largely adequately fenced reserves with sufficient management budgets…" As a result, most of the threats faced by other African lions in other countries "are not relevant to lions here."[2] Other studies have shown the African Lion population in several management areas of South Africa to be at or over capacity. Because of this, South Africa's Department of Environmental Affairs recommends that lions in South Africa be downgraded on the IUCN's Red List of Threatened Species from the current classification of "Vulnerable" to a classification of "Least Concern".[2] Also according to *Riggio et al. 2013*, there are approximately 32,000-35,000 African lions on the African Continent with at least 10% being found in South Africa alone.[3]

According to the *South African's Department of Environmental Affairs Non-Detriment Findings assessment for Panthera leo (African Lion) dated 25 September 2017*, "the total national wild population (in South Africa) is estimated at approximately 2876 individuals in an estimated land area of 41,745 km2… 83% of the population is well protected... recent quantitative data suggests that lion populations are stable to increasing. This healthy wild lion population persists alongside a large captive population of approximately 7,000 lions…"[4] "The trophy hunting of captive bred lions poses no threat to the wild lion population within South Africa, and it is thought that captive lions in fact serve as a buffer to potential threats to wild lions by being the primary source of hunting trophies…"[4] "In South Africa very few wild lions are trophy hunted each year and hunting trophies are largely sourced from captive populations".[4] The report goes on and states "There is currently no major threat facing wild lions within South Africa". The report also mentions "the revenue generated through hunting contributes to the maintenance of areas where wild lion populations can continue to exist… The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat".[4] These factors alone undisputedly prove that the African Lion, Panthera leo, is

increasing in South Africa and have far surpassed the minimum numbers necessary to be listed as "least concern" in South Africa.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

My hunting party was filming, photographing and conducting research for ourselves and creating advertising media for the outfitter, and as part of our arrangement we were provided hunts at an unusually low amount. The hunts typically run $25,000-$45,000+. In addition to the services and media we provided I paid the Outfitter $10,000 to cover licenses and salaries of employees. food for local school and conservation projects. In addition to the services and fees I paid the outfitter, I tipped the Professional Hunter $1,000. There were two trackers and I tipped $600 and $400 each respectively. I also tipped $80-$200 to each staff (cook, maid, skinners, and driver) of the Outfitter depending on the service they provided to me. I interviewed the Professional hunter about what they do with the funds and he then showed us where a significant percentage of money paid to CMP Safaris is used to help provide a quality meal several times a week to the local school called Kgalaeo Primary School near Vorstershoop, South Africa. These meals are often the only quality meal that is provided to these children as the communities near CMP Safaris are clearly very poor and live in what I would call a one room shack. These children depend each week on lion hunters to provide wild game for their food. The money produced by lion hunting with the outfitter is used to fund this project. In addition to providing food for Kgalaeo Primary School, a portion of the trophy fee is given to the South African Predator's Association (SAPA) for conservation projects they oversee and direct in protecting and conserving the African Lion. SAPA over the past few years has proven that captive bred lions can be introduced into the wild and flourish. [5] Because I utilized CMP Safaris for my hunt a portion of the outfitter's fee is given to SAPA. SAPA uses those funds to purchase GPS collars to study wild lions to better aid conservation efforts. Money is also utilized to help other wildlife in drought stricken areas and to fight poachers of wild lions, managed wild lions and other animals. CMP Safaris and SAPA furnish food and supplies to poor income families.

It is well known in Africa that CMP Safaris, an accredited member of SAPA, provides regular meals to the children and staff at the Kgalalelo Primary School in Vorstershoop. This initiative forms part of SAPA's commitment to Social Enhancement. SAPA members all over South Africa are running similar projects to uplift local communities.[12] A percentage of the money paid to CMP Safaris is given to SAPA to help with other social enhancement projects across Africa. SAPA's Nietverdiend Social Enhancement Project utilizes time and money from other accredited outfitters to donate food, toys and stationery to Nietverdiend Primary School in the North West Province as part of SAPA's ongoing commitment to Social Enhancement.[13]

As a US Army Veteran, I unfortunately I cannot afford to pay $50,000-$100,000 to an outfitter to hunt a "wild" lion. However, I have dreamed of hunting a lion since I was a child and put in countless hours investigating the only type of hunt an average American Hunter could afford and with an outfitter that guaranteed a true African lion hunt. My extensive research lead me to SAPA accredited outfitters and ultimately CMP Safaris. I can certainly provide video of the hunt, photos, interviews, and proving this hunt was no different than hunting a "wild" lion. The lion I hunted was able to kill its own prey and had approximately 58 square miles to roam and

hunt. When I arrived at the hunting area, we spent a day tracking and watching the lion from a distance. I wanted to first observe the lions in their natural habitat and see the lion I was going to hunt. I had heard of unethical practices by non-SAPA outfitters and wanted to make sure this lion was in no way tainted, drugged or any other funny stuff. We tracked this lion for hours over several miles. I observed him through my binoculars and spotting scope. I observed him feeding on prey he had recently killed. This lion was as "wild" as any other lion I have ever watched or observed. I spoke to the owners of CMP Safaris numerous times in person at wildlife shows in the USA, on the phone and through email about my expectations, requirements and the fact if I observed any funny stuff or if the lion appeared anything but "wild" I would not be hunting. I can also tell you we covered a lot of miles on foot tracking and stalking this lion numerous times. At times it was not us hunting the lion it was the lion hunting us, as he circled around behind us and was stalking us. My hunting partner on this trip had hunted a "wild" lion several years ago and said this hunt was far more challenging and dangerous than his "wild" lion hunt.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted.

At the time of our hunt, CMP Safaris was a member of the South African Predators Association (SAPA). Through SAPA, CMP Safaris, coordinates and promotes establishing and maintaining a healthy and ethical predator breeding and hunting industry in congruence with national and international conservation principles and current national and provincial legislation. CMP Safaris limits lions exposure to humans. Their lions are initially born in an area of about 1-2 acres. As the lion matures it is moved into a 60 acre fenced in area to protect the lions from predators. Lions are raised in prides of 5-6 lions per 60 acre area and animals are introduced into the area for the lions to hunt/feed. Several weeks before a hunt lions are released into a larger area and then into an even larger area of approximately 15,000 hectares. The lion I hunted was nearly 7 years old and after he was released into the large area he hunted prey on his own. While tracking the lion we came across remains of carcasses the lion had killed, thus proving the lion I hunted was capable of surviving on his own.

As a member of SAPA, CMP Safaris also provides funding to support lions that were bred in captivity and released into the wild and are not only surviving but doing exceptionally well.[5] This research has proven that African Lions bred in captivity can be utilized to repopulate areas where lion populations have dropped in other countries. SAPA's research has clearly shown that lions bred in captivity and strategically released into the wild can and do survive. Without incentive for these breeders to breed lions, the captive bred population of lions will be euthanized because of the high costs of maintaining feeding and maintaining the lions. This will then turn the demand for hunting directly on wild lions which has already occurred in other countries of Africa.

The trackers and professional hunter from CMP safaris have been utilized by the government of South Africa to help track down poachers of wild lions and other animals as they are the absolute best lion trackers in the world. Without the money they receive from the outfitter and the tips from hunters these trackers would have to find other employment and poaching of wild lions would increase. CMP Safaris and SAPA aids in catching lion poachers and poachers of other wild animals by providing trackers and offering rewards for the capture of poachers. SAPA and

CMP Safaris also provides food and money to help starving and/or sick wild animals/lions in needed areas.

The *Government Gazette (2018)* studies show that "Hunting of wild lion on private property is limited, with less than 5% of lion hunts conducted over the 2008-2010 reporting period having targeted wild lions. The revenue generated through hunting (wild and captive-bred lions) contributes to the maintenance of areas where these (wild) lion populations can continue to exist. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat".[4]

The South African Predators Association (SAPA) does not accept all lion breeders into their membership. To become a member of SAPA a ranch owner must complete an application for membership and undergo an intensive investigation and review of their facilities. There are several minimal standards that must be met in order to qualify. SAPA requires a minimum of 1,000 hectares, which is equivalent to 2,471 acres or 3.9 square miles, for hunting. I hunted with CMP Safaris and the area you hunt lions is between 4,500 acres to 37,000 acres or 58 square miles depending on the number of lions released into the area. We hiked for several hours tracking the lion I hunted. Although the lion had 58 square miles to roam and hunt it's prey, the GPS I utilized while hunting showed the lion I hunted covered an area just over 7 square miles. While observing and hunting the lion I saw numerous animals; zebra, eland, blue wildebeest, impala, gemsbok, kudu. We came on 2 animals killed recently by the lion. SAPA requires minimal human contact with lions, water sources, numerous non-domesticated prey, non-cultivated land and a lot more requirements.[8] The land I hunted in was just that.

Research on populations of lions in South Africa and other countries such as Tanzania has shown an increase in wild lion populations where captive bred lion hunting has increased. In Tanzania in 2008, there was 138 hunting lions exported, in 2010 there was 128 exported, in 2011 there was 55 exported, 2012 there was 62 exported and in 2013 only 11 were exported.[6] During this same time frame the number of captive bred lion hunts has increased. In 2015 there was only approximately 24 wild lions killed in Africa yet the number of captive bred lions increased to over 500.[6] This same Federal Register article from 2015 further states "...the captive-lion industry in South Africa may reduce the pressures of trophy hunting on the wild populations in South Africa, which is evidenced by the fact that 99 percent of lion trophies from South Africa are of Captive orgin".[6] This is irrefutable proof that the ethical hunting of captive bred lions has not only conserved the wild lion population but has also increased the population of lions in the wild. This coincides with studies referenced by the United States Fish & Wildlife Service (USFWS) that have indicated that captive bred hunting would lead to a decrease in the hunting of wild lions. Directly due to captive bred hunting, the IUCN and CITES research has shown over the last 21-24 years there has been a 29% increase in lion population in South Africa and South Africa is at or over the number of lions that can be sustained in their lands. The USFWS in 2016 reported that there is no endangerment of lions in South Africa and they are not currently endanger of extinction.[10]

Despite what some environmentalists would like many to believe, the fact is research has proven that hunting of captive bred lions has enhanced and benefited the wild lion population.

According to the *Federal Register (2015)*, Research on populations of lions in South Africa and other countries such as Tanzania has shown an increase in wild lion populations where and when captive bred lion hunting has increased.[6] Specifically in Tanzania in 2008, there was 138 hunting lions exported, in 2010 there was 128 exported, in 2011 there was 55 exported, 2012 there was 62 exported and in 2013 only 11 were exported. During this same time frame the number of captive bred lion hunts had increased. In 2015 there was only approximately 24 wild lions killed in Africa yet the number of captive bred lions increased to over 500. This is irrefutable proof that the ethical hunting of captive bred lions has not only conserved the wild lion population but has also increased the population of wild lions. Those countries who do not have captive bred lion hunting have seen a decrease in lion populations. Because of captive bred hunting, the IUCN and CITES research has shown over the last 21-24 years there has been a 29% increase in lion population and South Africa is at or over the number of lions that can be sustained in their lands. In addition the article mentioned above in the *Federal Register* also states "while the captive-lion industry may not be contributing to the conservation of the species in the wild via reintroduction, the captive lion industry in South Africa may reduce the pressures of trophy hunting on the wild populations in South Africa".[6] This has been evidenced by the fact that 99% of the lion trophies from South Africa are of captive bred origin.[6] And South Africa has seen the largest increase in wild lion populations to the point that in most areas the lions are over capacity. In the United States, the USFWS "culls" the bison herd in Yellowstone when the number of bison goes over the capacity of the park.

The purpose of the Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. In other words the ESA primary goal is the survival and recovery of a species within its native ecosystem. By the ESA's own admission the Act is not well suited to consideration of animals (specimens) bred, raised or held in captivity and unfortunately captive bred lions are not eligible for separate consideration for listing on the endangered list.[6, 9] In fact the approximately 7,000 captive bred lions in South Africa and thousands more in other areas of Africa and around the world are not counted in the total population number of African Lions. Thus the African lion population numbers quoted in studies and research and the IUCN Red list do not include the captive bred population. If the population of captive bred lions was included, the African lion Panthera leo melanochaita which is now classified as Vulnerable by the IUCN would not even be listed as least concern in South Africa as their wild lion populations are at or over capacity in most areas[9]. Furthermore, according to the best available data and the IUCN, the current population of African lions is between 23,000-39,000 lions (not counting captive bred which if included would bring the total to 31,000-47,000). No study includes the population of over 7,000 captive bred lions in their numbers. The authors of the research failure to include all lions is an obvious attempt to deceive the public, the IUCN, the USFWS and others in an attempt to have the lions protected by the Endangered Species Act when the facts are the African lion is at or over capacity in South Africa. Former Director of the USFWS, Dan Ashe and the USFWS has said "The subspecies of P. l. Melanochaita likely numbers between 17,000-19,000 and is found across southern and eastern Africa. The USFWS determined that this subspecies is less vulnerable and is not currently in danger of extinction".[10] In the same article the USFWS then says lions are decreasing in other areas of Africa and because of this are listed under the Endangered Species Act, despite the mountain of evidence that clearly shows this is far from the case in Southern Africa and Eastern Africa.[10] The USFWS further stated that "Many of the increasing southern African (lion) populations are in small, fenced and intensely managed areas that have already

reached carrying capacity".[11] It is well known that the roughly 5,000 American Bison in Yellowstone National Park are frequently at or over capacity for the park. To alleviate this, the USFWS has them rounded up and slaughtered. In 2017 the USFWS killed roughly 1,200 Bison. The reason given by the USFWS is to protect the species, the land from over grazing and other wildlife. Lions are much more dangerous than bison and kill or injure far more people and livestock. According to the USWFS lion population numbers in South Africa are at over carrying capacity. Thus hunting lions in South Africa both wild born and captive born should be hunted to protect the ecosystem, the lion, other wildlife, domestic animals and most importantly protect people.

Studies and the literature have proven that the African Lion's gestational period is approximately 106 days. Lions have 2-6 cubs per litter. And a lioness is polyestrous and will come into heat to be impregnated at least 4-5 times per year until she is pregnant. Research has absolutely proven that orphaned cubs will be adopted by other lions if the mother dies or abandons the cub. This fact alone is one of the biggest reasons that captive bred cubs should and could be introduced into wild lion prides. By allowing the importation of African lions bred in captivity from reputable breeders such as those certified by South African Predators Association, the USFWS ensures the continued growth of the captive bred population which may be utilized to enhance the wild lion prides and establish new healthy prides. Captive bred lion cubs are healthier than wild lions as they are vaccinated against disease, which is one of the main threats to lion cub's survival outside of predators. Without allowing import of captive bred lions, the USFWS will be directly causing the death of thousands of captive bred lions and hunters will return to hunting wild lions. This is already occurring in Africa since the lion import ban, as maintaining captive bred lions is extremely expensive. If there is no reason for breeders to raise lions than sadly the breeders will be forced to euthanize them simply because the cost to maintain them will be prohibitive. Breeders such as CMP Safaris are extremely cautious not to allow human imprint on their lions and to maintain a "wild" lion temperament. Currently, the USFWS says a lion is wild if it is born in the wild even if raised in captivity and called captive bred if born while in captivity even if raised in the wild the lion will still be called captive bred. *Abell et al (2013)* state that lion cubs born in captive bred prides should be utilized for reintroduction.[15] The only way this is going to happen is if the USFWS allows the import of captive bred trophies. Otherwise, there will be a drastic reduction of captive bred lions due to euthanization because the breeders will not be able to afford raising them. This is already happening in Africa. CMP Safaris informed me have thousands of lions that had been killed simply because of Former Director Ashe's decision not to allow import unless we can show a conservation effect.

It is well known that the primary reason for the African Lion to be listed as vulnerable in South Africa when science has proven they should be listed as "least concern" in South Africa is due to philosophical objections to hunting in general and not research. Many do not like the idea of lion hunting, yet have no problem with others slaughtering thousands of cattle or pigs each year that are raised in a pen or small fenced area. *According to Lindsey et al (2012)* "the primary benefit associated with captive-bred lion hunting is that it reduces hunting pressure on wild lion populations, and contributes to the South African economy…".[7] Even in the Federal Register, the USFWS stated "In South Africa, 99 percent of the lion trophies are captive bred, and, therefore, were not the result of removing lions from the wild".[6] This statement alone proves that the hunting of captive-bred lions is conserving the wild lion population. Allowing the import of lions

from SAPA accredited outfitters, such as CMP Safaris, definitely will conserve the wild lion population. Although extremely unlikely, if wild lions were to become extinct in areas, having a large captive bred lion population can be utilized to re-introduce lions into those areas.

The reintroduction of captive bred animals and captured animals has saved numerous species of animals. Just in the last 20 years wolves were reintroduced into the Yellowstone and surrounding ecosystem. The wolves released were of differing ages including pups as young as one year old and they have survived. Many other animals across the world have been restored by reintroducing their species from captive bred populations such as rhinos, cheetahs, lions and other wild species. Across the world it is the trophy hunters, primarily American Hunters, whose hunting and donations has saved numerous animals from extinction. Many environmentalists and conservationist want hunting stopped but the vast majority of them do not contribute time and money to restoring wildlife. The primary reason for the decrease in lion populations outside southern and eastern Africa is loss of available land due to global human population increases causing pressure on wildlife and habitat.[14] *Abell et al (2013)* in their research indicated "Captive bred animals are a logical source for reintroduction programs in instances where wild populations are precluded from translocation and reintroduction programs due to genetic incompatibility and disease prevalence. Captive populations can be secure and free from disease. Captive lions can be easily bred in sufficient numbers and in an environment where the species can easily acclimatize to release". [14] Joy and George Adamson released 17 hand reared lions (captive bred) into the wild using a soft-release strategy has been shown to be successful.[15] *Abell et al (2013)* indicated a benefit of using captive bred lions is reproduction rates, genetics and disease can be controlled. [15]

References

1. Bauer H, Chapron G, Nowell K, Henschel P, Funston P, Hunter L, Macdonald D, Packer C. (2015) Lion (Panthera Leo) populations are declining rapidly across Africa, except in intensively managed areas. *Proceedings of the National Academy of Sciences of the United States of America* 112 (48).

2. Funston PJ, Levendal M. (2015) Biodiversity Management Plan for the Lion (Panthera Leo) in South Africa. *Government Gazette. Department of Environmental Affairs Republic of South Africa.* 598: No. 38706

3. Riggio J, Jacobson A, Dollar L, Bauer H, Becker M, Dickman A, Funston P, Groom R, Henschel P, Iongh H, Lichtenfeld L, Pimm S. (2013) The size of savannah Africa: a Lion's (Panthera leo) view. *Biodiversity and Conservation* 22:127-35

4. Molewa, B. (2018) Non-detriment findings assessment for Panthera leo (African Lion). *Government Gazette. Department of Environmental Affairs Republic of South Africa.* 631: No. 41393

5. SAPA (2016) Captive-bred lions put end to debate. *South African Predators Association*

6. Department of Interior, Fish and Wildlife Service. (2015) Endangered and Threatened Wildlife and Plants; Listing Two Lion Subspecies. *Federal Register 80:246*

7. Lindsey P, Alexander R, Balme G, Midlane N, Craig J. (2012) Possible relationships between the South African captive-bred lion hunting industry and the hunting and conservation of lions elsewhere in Africa. *South African Journal of Wildlife Research 42 (1):11-22*

8. SAPA: SAPA Norms and Standards for hunting managed ranch lions. *South African Predators Association* http://www.sapredators.co.za

9. Department of Interior, USFWS. (2014) Endangered and Threatened Wildlife and Plants; Listing the African Lion Subspecies as Threatened With a Rule Under Section 4(d) of the ESA. *Federal Register 79:209*

10. Ashe D, USFWS (2016) Lions Are Now Protected Under The Endangered Species act. *USFWS Web Page*

11. USFWS (2016) Frequently Asked Questions Final Rule Listing Two Subspecies of Lion under the Endangered Species Act. *USFWS Web Site*

12. SAPA (2016): Social Enhancement Project by SAPA and CMP Safaris. https://www.youtube.com/watch?v=fBgJlxrpOFw

13. SAPA (2016): SAPA's Nietverdiend Social Enhancement Project. https://www.youtube.com/watch?v=W2yo4kzcEC8

14. Abell J, Kokes R, Youldon D. (2013). The long-term viability of current lion conservation strategies: A role for ex situ reintroduction. *Open Science Repository Natural Resources and Conservation.*

15. Abell J, Kokes R, Youldon D. (2013). A Framework for Ex Situ Reintroduction of the African Lion (Panthera leo). *Open Science Repository Natural Resources and Conservation.*

16. IUCN: Panthera leo-Summary-Population Trend -Assessment information *http://www.iucnredlist.org/details/15951/0*

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 54031

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 17 / 06 / 2017 Terminated 19 / 06 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: GG VAN SCHALKWYK

Business Address: FARM AURORA

VORSTERSKOOP

Code: 3615

ID No: 830917 5044 087

PH Permit No: CP76/10/2016 NW

Date: 19/06/2017 Signature:

CLIENT

Name: BRIAN [redacted] FIFE

Permanent Postal Addres: [redacted]

NEVADA Code:

Country: LAS VEGAS Tel/Fax:

Passport No [redacted]

Email:

Date: 19/6/2017 Signatur [redacted]

HUNTING OUTFITTER

Name: GG VAN SCHALKWYK

Business Address: FARM AURORA

VORSTERSKOOP Code: 3615

I.D. No: 830917 5044 087

Tel No: 083-3604234 Fax No:

HO Permit No: CP35/10/2016 NW

Date: 19/06/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
FARM	DR BSM	GG VAN SCHALKWYK CP06-33		15/6	WC-N	1		✓	FULL MOUNT
AURORA		AURORA			Leopard	1		✓	Skull, Hide, Meat
V185/830917		VORSTERSKOOP							
5044 087		3615							

Address to which trophies are to be sent: MCCORDALE TAXIDERMY

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies: Client: Original 1st Copy, White 2nd Copy, Blue Forward to Nature Conservation Authority where hunt took place

NB: Voluntary conservation contributions for every hunt would be appreciated. Please refer to [illegible]

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: O 10633

NAME OF ISSUING AUTHORITY	
NAME	READ
ADDRESS	Mini Garage Offices
ADDRESS	Kholopo & Wood St
PROVINCE	North. West

DETAILS OF PERMIT HOLDER

NAME	Brian Keith	ID NO.	
SURNAME	FIFE	PASSPORT NO.	(b)(6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS	(b)(6)	
ADDRESS	Las Vegas, NV	SAME
ADDRESS		
TOWN		
POSTAL CODE	89030	
PROVINCE	USA	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	GC Van Schalkwyk
NAME AND SURNAME : RESPONSIBLE PERSON	GC Van Schalkwyk
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Aurora
PHYSICAL ADDRESS OF FACILITY	Norsteinhoop
DISTRICT	Dr RSM
PROVINCE	North. West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 10/06/2017 at 06h00 and hunt from 14/06/2017 at 06h00. Hunt one (01) captive bred male lion of the farm Aurora - Camp A and transport the empty to: Mantalala Taxidermy, Bainsvlei - Bloemfontein

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	BK FIFE
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	GC Van Schalkwyk
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	GC Van Schalkwyk
WEAPON AND METHOD OF HUNTING	416 Rigby, Walk & Stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	N/A
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 10/06/2017	TO:	09/07/2017
RECEIPT NUMBER	R1150,00 EFT		
SIGNATURE OF ISSUING OFFICER:	DEPT. OF RURAL, ENVIRONMENTAL & AGRICULTURAL DEVELOPMENT [illegible] NORTH WEST PROVINCE	SIGNATURE OF PERMIT HOLDER:	(b)(6)
DATE STAMP:	12-04-2017		

re
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES

DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

Ordinary Permit No: O 10633

Please familiarise yourself with this terms and conditions.
The permit is not transferable.
This permit shall be subject to the provisions of any law in force during the period of validity of the permit.
The Hunter or Landowner who contravenes or fails to comply with any one of the conditions or requirements, to which this permit is subject, shall be guilty of an offence.
This permit only authorises the hunting of the animal during the day.
The Hunter will ensure that this permit is immediately available during the hunt.
The lion must be released in the hunting area a minimum of 96 hours prior to hunt and after receiving a permit to do so.
Information requested on this permit shall be done in ink and in print. False and unreadable information will cause this permit to be invalid.
No person shall hunt the wild animal or may be allowed by a landowner to hunt if the hunter did not beforehand acquire the necessary hunting skills and firearm training to: i) Ensure the safety of him or herself, other people and non targeted species. ii) Ensure a hunt which consists of generally accepted sound hunting ethics, a fair chase, the minimum cruelty and damage to the ecology of the hunting area.
No person may hunt when under the influence of alcohol or any substance that may deter his/her vision, judgement or in any way negatively affect his or her conduct.
A Hunter will immediately report the wounding of any wild animal to the landowner or his representative and will be responsible for the tracking down and killing thereof. If there is reasonable chance that the animal pose any threat to property or human life, the hunter and the land owner will immediately notify both the nearest Police station and the Local Nature Conservation district officer.
The landowner may at any time stop the hunt and withdraw the permit.
A Hunter should be accompanied by a designated official from this Directorate.
Animals may not be hunted under the influence of drugs.
Only animals that have been declared as wild by this directorate may be hunted. (No tame animals may be hunted)

No hunting with dogs is allowed.
Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. **A Nature Conservation Official must be present during the release and hunting of the lion.** **Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity.** Tell: 053 928 0656 or \071 889 7867\082 446 1816
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.

Signature of Issuing Officer: _____ Date: 12/04/2017

Signature of hunter: (b)(6) Date: 19/06/2017

Signature of land owner: _____ Date: 19/06/2017

Signature of PH: _____ Date: 19/06/2017

DEPT OF RURAL, ENVIRONMENTAL & AGRICULTURAL DEVELOPMENT
12 -04- 2017
P.O. BOX 112 VRYBURG 8601
NORTH WEST PROVINCE

re
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

ORDINARY PERMIT: O 10633

(ORDINARY TROPHY OR PARTS TRANSPORT PERMIT CONDITIONS)

This permit authorises the **transport** of the **Trophy or parts** of the animal of the hunted animal from the venue of hunting to the approved venues of activity as specified on the permit.
This permit does not authorize the **selling**, **possession**, **exporting**, **importing** of the **Trophy** or part/s specified on the permit.
This permit is not transferrable.

PLEASE OBSERVE PERMIT CONDITIONS AT ALL TIMES

Ms. A V Talakasi
Permit Officer
Biodiversity Management
Dr. Ruth Segomotsi Mompati District
North West Province

DEPT. OF RURAL ENVIRONMENT & AGRICULTURAL DEVELOPMENT
DR RUTH SEGOMOTSI MOMPATI DISTRICT
12 -04- 2017
P.O. BOX 112 VRYBURG 8600
NORTH WEST PROVINCE

The DEDECT

Department:
Economic Development, Environment, Conservation and Tourism
North West Provincial Government
Republic of South Africa

OK Building
Market Street
P.O Box 112,
Vryburg, 8600

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT AND CONSERVATION

Tel: (053) 927 1809
Fax: (053) 927 2904
ehorn@nwpg.gov.za

STATEMENT BY THE HUNTER, PROFESSIONAL HUNTER AND LANDOWNER

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: 010633

Name of Hunter, Home address, Tel Number and Passport / ID number
BRIAN KEITH FIFE
7216 FALVO AVENUE, LAS VEGAS, NV 89032 USA

Outfitter. Name & North West permit number
GG VAN SCHALKWYK: HH-035/10/2016 NW

Prof Hunters. Name & North West permit number of the two (2) PH's conducting the hunt
GG VAN SCHALKWYK: PH - 076/10/2016 NW

Description of animal Sex, Age, Origin (Docs e.g, Transport, Keeping & Import) and exact date and time released
1 X MALE LION
Release : 10/6/2017

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: 010633

Details of Hunting area: Name, Size and Ownership
CAMP B
FARM AURORA, VOORSTEBOSHOOP

I hereby acknowledge that I am fully aware of the following:

1. This lion was bred in captivity
2. That this animal will be hunted in a confined area
3. That this lion was released in the hunting area a minimum of 96 hours prior to this hunt
4. That this hunt may not be recorded as a wild or free roaming hunt

(b)(6)

Signature of Client (Hunter) — Date: 19/6/2017

Signature of Professional Hunter No 1 — Date: 19/6/2017

Signature of Professional Hunter no 2 — Date

Signature of Hunting Outfitter — Date: 19/6/2017

Signature of Landowner — Date: 19/6/2017

BISON CONNECT

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] Re: Import permit

2 messages

Management Authority, FWHQ <managementauthority@fws.gov> Tue, Apr 16, 2019 at 7:54 AM
To: Brian Fife (b)(6)
Bcc: emma_nelson@fws.gov

Dear Mr. Fife,

We can confirm that your application was received on September 6, 2018, and assigned to Emma Nelson. She will contact you if she has any concerns regarding your application request.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Sun, Apr 14, 2019 at 4:54 PM Brian Fife <(b)(6) wrote:

I mailed my permit and fee in August 2018. hed a month later. When can I expect to hear back?

Brian Fife

Sent from my iPhone

On Feb 28, 2018, at 9:54 PM, Management Authority, FWHQ <managementauthority@fws.gov> wrote:

> Good evening Mr. Fife,
>
> You may submit an application request for the import of a lion trophy by completing application form 3-200-20 in entirety and mailing it to our office (address below) with the application processing fee. The application processing fee is non-refundable once your application has been reviewed and the fee does not guarantee issuance of a permit.
>
> The African lion is listed in Appendix II of CITES. It is also listed as either threatened or endangered in the Endangered Species Act (ESA).

Due to the **CITES**, **appendix II listing** status of African lions, the CITES Management Authority of the exporting country must determine that the export of the lion will not be detrimental to the survival of the species in the wild before they issue a CITES permit for the export of the lion. CITES import permits are required for those species that are listed in Appendix I of CITES, but the United States does not require CITES import permits for species listed in Appendix II of CITES. Therefore, a CITES import permit would not be required to be obtained to import a lion into the United States. However, the lion would still have to be **inspected and declared to our U.S. Fish and Wildlife Service Office of Law Enforcement** before it is imported into the United States. Further more, due to the ESA listing status of African lions, it is important to be aware that although this office does not require a CITES import permit to bring an African lion into the U.S., we **do require an ESA import permit** to issued by this office before a lion trophy can legally be imported.

The ESA listing status of the lion depends on the subspecies of the lion:

- African lion (*Panthera leo leo*) is listed as endangered in the ESA. This includes West, Central, and North African populations.
- African lion (*Panthera leo melanochaita*) is listed as threatened in the ESA. This includes South and East African subspecies of lions.

It is also important to be aware of the fact that in order for this office to issue an ESA permit to import a lion trophy, upon review of an application request, we must be able to determine that the import meets the enhancement criteria in the ESA. Part of the ESA enhancement criteria requires the import of the lion to either be for scientific research related to the same subspecies of lion or that the import will enhance the survival of African lions in the wild. For detailed information, please review 50 CFR 17.22.

We encourage permit applicants to review our tips and reminders for completing applications.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803
Stamp out extinction with the Save Vanishing Species Stamp

On Tue, Feb 27, 2018 at 4:41 PM, PermitsWestLE, FWS <permitswestle@fws.gov> wrote:

> I am forwarding your message to the contaqct for CITES permits.
>
> Apply for IE License online: https://www.fws.gov/elicense/
> Information for businesses: https://www.fws.gov/le/businesses.html
>
> Permits West
> US Fish and Wildlife Service
> Office of Law Enforcement
> 2800 Cottage Way, Suite 2928
> Sacramento, CA 95825
> (916) 414-6660
>
> ---------- Forwarded message ----------
> From: **Brian Fife** <docfife@msn.com>
> Date: Tue, Feb 27, 2018 at 12:12 PM
> Subject: Import permit

To: "permitsWestLE@fws.gov" <permitsWestLE@fws.gov>

To Whom It May Concern:

How do I go about obtaining a CITES import permit for lion hunted in Africa? The FWS website is extremely confusing. Any help would be appreciated.

Best Regards,

Brian K. Fife(b)(6)

(b)(6)

PLEASE TAKE NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from any computer. Should you chose to not receive any further e-mails, or consider this spam, please send an e-mail reply to not send any further e-mails.

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Sep 26, 2019 at 1:43 PM
To: Brian Fife (b)(6)
Bcc: emma_ne

Good afternoon Mr. Fife,

The U.S. Fish and Wildlife Service International Affairs Program works to conserve our nation's wildlife and species of international concern. In order to provide our best customer service, we are currently focusing on processing permit applications and are not providing status updates on permit applications at this time. Once you receive your acknowledgement e-mail indicating your application number, please allow us time to evaluate your application. If we need additional information, we will contact you.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS

U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Thu, Sep 26, 2019 at 1:27 AM Brian Fife <docfife@msn.com> wrote:

> Emma Nelson,
>
> Last year I mailed in an applicaon f or a permit to bring a lion into US I had hunted in 2017. Your recieved the applicaon on 9/6/2018. I w as wondering when the permit would be approved.
>
> **Best Regards,**
>
> **Brian K. Fife** (b)(6)
> (b)(6)
>
> **PLEASE TAKE NOTICE**: The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from any computer. Should you chose to not receive any further e-mails, or consider this spam, please send an e-mail reply to not send any further e-mails.
>
> ---
>
> **From:** Management Authority, FWHQ <managementauthority@fws.gov>
> **Sent:** Tuesday, April 16, 2019 4:54 AM
> **To:** Brian Fife (b)(6)
> **Subject:** Re: [EXTERNAL] Re: Import permit
>
> [Quoted text hidden]

RCVD SEP 6 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Zelff	Peter	Herbert	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address

(b)(6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, ock; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Batavia	NY	14020	Genesee	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is edge and belief. I understand that any false statement herein may subject me to the criminal penalties

(b)(6)

8/31/2018

nit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1.** If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Peter Zeliff (b)(6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo.

   b. Sex (if known).
   Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   Republic of South Africa (RSA)
   Kalahari oryx Private Game Reserve

   b. Date wildlife was hunted: 20/08/2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
   Chapunga SAfaris

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
   Kalahari oryx Private Game Reserve

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Natasha Lotter
Business Name: Swift Dip
Address: Po Box 1333
City: Thabazimbi
State/Province: Limpopo Province
Country, Postal Code: republic of South Africa, 0380

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted? yes -
   Free Range Extensive Certificate as per RSA Government - DEA Dated 16/02/2017.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
   Could be obtained from the landowner.
   Kalahari Oryx Private Nature reserve
   Contact details
   Email - johan@kalahari-oryx.com.

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: (b)(6) _____ Date: 8/31/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

environmental affairs
Department
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · 437 Steve Biko Road · Arcadia · PRETORA Tel (+27 86) 111 2468

Enquiries: Mr Mpho Tjiane
Tel: (012) 399 9596 **Email:** MTjiane@environment.gov.za

Department of Environmental Affairs and Nature Conservation
Private Bag X6102
KIMBERLY
8301

Fax: (053) 807 7367

Dear Mr Jacobs

CONFIRMATION OF KALAHARI ORXY AS A FACILITY IN POSSESSION OF WILD *PANTHERA LEO* (LION) POPULATION

The South African Government has in the 2016 annual year submitted information on the enhancement of the hunting of the wild South African lion populations to conservation of the species and upon a thorough assessment, the United States Fish and Wildlife Service has approved the enhancement finding on the hunting of the South African populations of Wild lions allowing for the importation of trophies from wild sourced lions.

In order to ensure that integrity of the hunting farms that possesses wild lions, an assessment criteria was developed which looks at aspects including: the area is sufficient to sustain a single social unit, the populations have a viable social structure, they are breeding in area in which they are roaming, the animals are not fed or receive any supplementary feeding and that the populations are from the wild.

In light of the above, the South African Government would like to confirm that Kalahari Oryx Private Game Reserve situated in the Northern Cape has been recommended as a facility that is possession of wild lion populations that are viable for hunting purposes.

Hope you find the above in order.

Yours sincerely

Ms Nosipho Ngcaba
Director-General
Department of Environmental Affairs
Letter signed by: Mpho Tjiane
Designation: Deputy Director CITES
Date: 16/02/17

ODB.Number: 1414/2018 Permit No: FAUNA 0643/2018 Application ID: 37645

Questico 7

Issued in terms of the provisions of:
National Environmental Management: Biodiversity Act 10 of 2004

Biodiversity

Northern Cape Province

Integrated Competence

Permit

Ordinary

Hunting

Lion Hunting

Issued in terms of the provisions of:
Northern Cape Nature Conservation Act, 9 of 2009

SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND PERMIT CONDITIONS AS PER ADDENDUM 1 AND PAGES ATTACHED

Authorising Entity / Institute / Company

Peter Herbert Zeliff - ID or Passpor(b) (6) - Farm name: - Physical Address:(b) (6)
International - NY 14020

Postal address: 4559 W Saile Drive, Batavia, NY 14020, USA

Contact details: Office: - Home: - Cell: - Fax: - E-mail:

Region in which restricted activity will take place

ZF Mgcawu (Siyanda) - Northern Cape Province

Address / Place / Fixed Property where restricted activity will be carried out, conducted or take place

Kalahari Oryx Game Farm, Upington, Siyanda, Northern Cape Province

Digital signature of verifier

MD Smit

Digitally signed by MD Smit
DN: C=ZA, E=mdsmit@nzpg.gov.za, O=Department of Environment and Nature Conservation, OU=Permit Administration, CN=MD Smit
Location: Kimberley
Reason: This document has been verified as correct according to departmental legislation, policy and prescripts and I attest to the accuracy and integrity of this document
Contact Info: 0536077485
Date: 2018.08.09 12:09:51+02'00'

Issuing authority

VALIDITY PERIOD

FROM 18/08/2018 TO 18/09/2018

Stamp if applicable

HUNTED

Permit holder / Dealer

(b) (6)

Signature of Issuing Authority

8/8/2018

20/08/2018
Date of Signature

ADDENDUM 1

PRESCRIBED FEES

The prescribed fees paid for the issuing of this document shall not be refunded

Tariff: All unspecified - Amount currently owed: R50 - Debit amount: R50 on 12/07/2018 with receipt number: Kalahari Oryx - 1841628679

SPECIES AND NUMBERS PERMITTED

Live, Panthera leo, Lion, Leeu - 1 (One) -Species sex: Male,

STANDARD RESTRICTED ACTIVITIES AND METHODS PERMITTED

Hunting, catching, capturing and killing
a) as per standard and special permit conditions
b) as per any other additional restricted activities specifiend

SPECIAL RESTRICTED ACTIVITIES AND METHODS PERMITTED

None

ADDITIONAL RESTRICTED ACTIVITIES AND METHODS PERMITTED

None - by using the following prohibited method and/or instrument namely: None

GENERAL PERMIT CONDITIONS APPLICABLE

1) This permit is not transferable to any individual person or any other legal identity.

2) Any alterations to this permit shall immediately render it invalid.

3) This permit is deemed valid only:
a) in the original format as issued by the Director.

b) for the period as specified on the permit.

c) once the signature of the holder thereof has been endorsed thereon in ink.

4) The Director reserves the right to amend, withhold, withdraw or cancel any permit at any time.

5) This permit shall lapse / be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.

6) This permit, unless otherwise stated, is valid only within the boundaries of the Northern Cape Province and then specifically only for the property as specified on the permit.

7) This permit does not grant the permit holder automatic access to any Protected area, National Park, Provincial Nature Reserve or privately owned land. Any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion must also be adhered to.

8) The permit holder must at all times while performing any restricted activity have the permit and all relevant documentation in his / her possession.

9) Permits must be made available upon request of any authorized person. This person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection.

10) If applicable, the permit holder must within 21 days after performing the restricted activity furnish the Director with a written return as prescribed, with feedback on the results of the activity conducted.

11) If applicable, the permit holder shall apply for the renewal of the permit to the Director, on the appropriate application form, at least 3 months prior to the expiry date thereof.

12) The holder of this permit shall return the original to The Director: Permit Administratio

(b) (6)

Signature of Issuing Authority

3/5/2018

20/08/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 *(Cal) Tel: 027-341 1779 Fax: 027-341 1718* *(De Aar) Tel: 053-6310 601 Fax: 053-6310 343*

ADDENDUM 1

fourteen days from the date of expiry thereof.

13) No new permit applications will be processed prior to the return of the original permit, once it has been used or once it has expired.

14) This permit is subject to the provisions of any law in force, during the period of validity of the permit, in respect of the specific area to which the permit applies.

15) This permit is subject to any applicable norms and standards in existence at the time of issuance of this permit.

16) It is the permit holder's responsibility to obtain information on any other legislation or changes thereto and any specifications or permit requirement that may be needed or required from any other department / organization / institute, for any activity as authorized by this permit.

17) It should be noted that any transgression, failure to render the required reports and or the return of the original permit, can jeopardize any future applications by the permit holder.

18) If the holder of this permit contravenes or fails to comply with any permit condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

STANDARD PERMIT CONDITIONS APPLICABLE

HUNTING

1) The permit holder may NOT use:

a) a fire-arm having a barrel of a caliber of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities.

b) a fire-arm having a barrel caliber of less than 9.525 mm (.375 of an inch) to hunt any buffalo, elephant, lion, leopard, rhinoceros or hippopotamus unless authorised in the restricted activities.

2) When a hunter kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed.

3) This permit can only be used and consider being valid after:

a) the landowner has provided written permission to the hunter for the hunt.

b) the landowner has provided written permission to the hunter / client to remove the carcass.

4) Unless authorized by a valid Game Farm Permit, authorised in the restricted activities or authorised by another permit to this effect, no person may hunt, capture or catch any wild animal-
a) by means of fire;
b) by means of poison;
c) by means of aircraft;
d) during the night
e) with the aid of an artificial light, floodlight or spotlight;
f) by means of any trap
g) by means of any snare;
h) by means of a spear, kierie, stick or any similar device;
i) by means of a blowpipe or similar device;
j) by means of an air gun;
k)by means of a fire-arm which discharges a rim-fire cartridge of a 5.6mm (.22 inch) caliber or smaller caliber;
l)by means of a fire-arm which discharges more than two shots without being manually reloaded;
m) by means of a shotgun, except for the hunting of birds;
n)by means of a bow-and-arrow, cross-bow or similar device discharging an arrow or dart;
o) by means of a set gun or any similar device;
p)by means of darting or any device which injects an intoxicating or a narcotic agent or poison into such animal;
q)which is kept in captivity, confined to a cage, in an enclosure or trapped against a fence where the animal does not have a fair chance of evading the hunter;
r)which is under the influence of any tranquilizing or narcotic immobilizing or similar agent;
s)by the use of a dog, except for the hunting, flushing, pointing or retrieving of birds

(b) (6)

Signature of Issuing Authority

5/8/2018

20/08/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341 1718 (De Aar) Tel: 053-6310 601 Fax: 053-6310 343

(Kuruman) Tel: 053-712 8702 Fax: 053-712 0936 (Upington) Tel: 054-3322885 Fax: 054-3311155

ADDENDUM 1

animal which has been wounded;
t)in the case of birds in or upon any aquatic systems, by the use of a boat for the purpose of chasing or killing such birds;
u)by means of setting a set trap within 10 meters from a common boundary;
v)by luring by means of a simulation or recording of the natural sound made by an animal or by means of bait or scent or any other induced luring method;
w)in an area smaller than the set standard of 400 hectares, as determined by the Director from time to time;
x)any other device of which the use would result in injuring or killing an animal in a way which is not humane;
y) by means of any other animal or bird of prey for the sport of falconry; or
z) by means of a firearm fitted with a silencer or similar noise-reduction device;

provided that in respect of the hunting of : -

i)rodents, excluding porcupines and springhare, the provisions of paragraphs (b), (d), (e), (f), (g), (m), (q) or
ii) any wild animal by a registered veterinary surgeon in the practice of his or her profession, the provisions of paragraph (p) and (q), or
iii)damage-causing animals as specified in Schedule 4, the provisions of paragraphs (d), (e), (f), (g), (p) (q) (r) and (v) shall not apply.

SPECIAL PERMIT CONDITIONS APPLICABLE

DANGEROUS GAME HUNTING

The permit holder must ensure that:

1) a fire-arm having a barrel caliber of at least 9.525 mm (.375 of an inch) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus.

2) the hunter is escorted by two Northern Cape Province registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals.

3) no prohibited hunting method is used to hunt an animal, unless approved by this permit.

4) the animal which is hunted, is not a "put and take animal" and such animal must qualify as free ranging (wild) for at least a period of twenty four (24) months prior to the hunting thereof.

7) if the hunter belongs to any hunting organisation, the hunt is conducted in an approved hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity.

8) no hunting of a lion takes place unless a representative of the relevant conservation department is present. (Note: arrangement can be made with Mr. Wessel Jacobs at 082 411 7179 or at 053 8077482 to be present during the hunt).

9) any offical who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this regard.

LION HUNTING

The permit holder must ensure that:

1) no tame or captive bred large predator is hunted.

2) no large predator is hunted which is under the influence of a tranquiliser, narcotic, immobilising or similar agent.

3) no baiting or any luring of a large predator take place.

4) no hunting of a large predator take place close to or when pressed against a fence or in any other a situation from which it has no escape.

ADDITIONAL PERMIT CONDITIONS APPLICABLE

1) Other people included on this permit -

a) JvW Hartzenberg - ID: 6901135055088 (PH)
b) MW Jacobs - ID: 6003045027081 (DENC)

(b) (6)

Signature of Issuing Authority

5/8/2018

20/8/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341 1718 (De Aar) Tel: 053-6310 601 Fax: 053-6310 343

(Kuruman) Tel: 053-712 0707 Fax: 053-712 0816 (Upington) Tel: 054-3327885 Fax: 054-3344455

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 69382

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 19 / 08 / 2018 Terminated 21 / 03 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)		Free State (FS)		Gauteng (GP)		Limpopo Province (LP)		North West (NW)		Mpumalanga (MPA)		Western Cape (WC)		Eastern Cape (EC)		Northern Cape (NC)	X

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: JN. Raubenheimer

Business Address: Kruisrivier Singel no 46, Durbanville, Cape Town

Code: 7550

ID No: 8901095060084

PH Permit No: 076/2016

Date: 20/08/2018 Signature:

CLIENT

Name: Peter Herbert Zelf

Permanent Postal Address: [redacted]

Batavia, NY Code: 14020

Country: USA Tel/Fax:

Passport No: [redacted]

Email:

Date: 20/08/2018 Signature: [redacted]

HUNTING OUTFITTER X

Name: JVW Hartzenberg

Business Address: 1 Westerdal Jrd. Durbanville, Cape Town Code: 7530

I.D. No: 8901095060084

Tel No: 082 554 2304 Fax No:

HO Permit No: 008/2017

Date: 20/08/2018 Signature: JVW. Hartzenberg

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Kalahari Oryx	Groblonga	Oryx Management Services	0643/2018	20/08	Lion	1		X	Full Cape Skull + Teeth,
			133/2014	20/08	Steenbok	1		X	Full Cape Skull
LION HUNTED IN MY PRESENCE.						20/08/2018.			

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies:

Client	Original	White	
	1st Copy	Pink	Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter	2nd Copy	Blue	Retain for a period of three years
Taxidermist	3rd Copy	Green	Taxidermist
Professional Hunter	Last Copy	Yellow	Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

ODB Number: 162/2014 Permit No: FAUNA 133/2014 Application ID: 21333

Biodiversity

Northern Cape Province

Integrated Competence

Permit

Standing

Game Farm / CAE

Game Farm - Plains Game, Lion and Rhino

Issued in terms of the provisions of:
National Environmental Management: Biodiversity Act 10 of 2004

Issued in terms of the provisions of:
Northern Cape Nature Conservation Act, 9 of 2009

SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND PERMIT CONDITIONS AS PER ADDENDUM 1 AND PAGES ATTACHED

Authorising Entity / Institute / Company

Oryx Management Services (Pty). Ltd.

Johan Frederik Maritz - ID or Passport (b) (6) [redacted] Farm name: - Physical Address: Tweepoort - Upington - Northern Cape Province - 8800

Postal address: PO Box 293, Upington, Northern Cape, 8800

Contact details: Office: - Home: - Cell: +27834069729 - Fax: - E-mail: johan@kalahari-oryx.com

Game Farm

Kalahari Oryx

Hectares

86,948.00

In the Division -

Siyanda - Northern Cape Province

Of which the description of boundaries is as follows

The property known as Kalahari Oryx the boundaries of which are described in Deed of Transfer No. T. 1860/2001, 1754/2001, 3661/1991, 3516/2008, 2253/2011, 2506/2009, 3733/2000, 571/2001, 1937/2001 & 2681/2008

Fence classification

1A (2,4m with mesh)

Digital signature of verifier

CScholtz

Digitally signed by CScholtz
DN: C=ZA, E=cscholtz@ncpg.gov.za, O=Department of Environment and Nature Conservation, OU=Permit Administration, CN=CScholtz
Location: Kimberley
Reason: This document has been verified as correct according to departmental legislation, policies and prescripts and I attest to the accuracy and integrity of this document
Contact Info: +27538077451
Date: 2014.04.03 10:29:12+02'00'

Issuing authority

VALIDITY PERIOD

FROM 03/04/2014 TO 03/04/2019

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

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BYLAE 1 / ADDENDUM 1

PRESCRIBED FEES

The prescribed fees paid for the issuing of this document shall not be refunded

Tariff: Game Farm Renewal - Amount currently owed: R50 - Debit amount: R50 on 24/01/2014 with receipt number: Kalahari Oryx CAE - 416532413

SPECIES AND NUMBERS PERMITTED

Black Rhinoceros, Swartrenoster, Diceros bicornis bicornis

Black Wildebeest, Swartwildebees, Connochaetes gnou

Blesbuck, Blesbok, Damaliscus pygargus phillipsi

Blue Wildebeest, Blouwildebees, Connochaetes taurinus

Bontebok, Bontebok, Damaliscus pygargus pygargus

Buffalo, Buffel, Syncerus caffer

Burchell's Zebra, Bontsebra, Equus burchellii

Common Duiker, Gewone duiker, Sylvicapra grimmia

Eland, Eland, Taurotragus oryx oryx

Gemsbuck, Gemsbok, Oryx gazella

Giraffe, Kameelperd, Giraffa camelopardalis

Hartmann's Mountain Zebra, Hartmannse bergsebra, Equus zebra hartmannae

Impala, Rooibok, Aepyceros melampus melampus

Klipspringer, Klipspringer, Oreotragus oreotragus

Kudu, Koedoe, Tragelaphus strepsiceros

Lion, Leeu, Panthera leo

Mountain Reedbuck, Rooiribbok, Redunca fulvorufula

Nyala, Njala, Tragelaphus angasii

Ostrich, Volstruis, Struthio camelus

Red Hartebeest, Rooihartebees, Alcelaphus buselaphus

Roan Antelope, Bastergemsbok, Hippotragus equinus equinus

Sable, Swartwitpens, Hippotragus niger niger

Springbok, Springbok, Antidorcas marsupialis

Steenbok, Steenbok, Raphicerus campestris

Tsessebe, Sassaby, Damaliscus lunatus

Warthog, Vlakvark, Phacochoerus africanus

Waterbuck, Waterbok, Kobus ellipsiprymnus

White Rhinoceros, Witrenoster, Ceratotherium simum simum

RESTRICTED ACTIVITIES AND METHODS PERMITTED

Hunting, catching, capturing and killing - by using the following prohibited method and/or instrument namely: as stipulated in point 2 of the "GAME FARM CONDITIONS" in the standard conditions

Signature of Issuing Authority

03 April 2014

(b) (6)

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

Having in possession or exercising physical control over any DEAD specimen - by using the following prohibited method and/or instrument namely: None

Conveying, moving or otherwise translocating a DEAD specimen - by using the following prohibited method and/or instrument namely: None

Process, prepare, cure, tan or treat in any manner whatsoever, to manufacture any article from such carcass or to mount or exhibit any article of such carcass - by using the following prohibited method and/or instrument namely: None

Selling or otherwise trading in, buying, receiving, giving, donating or accepting as a gift, or in any way acquiring or disposing of any specimen - by using the following prohibited method and/or instrument namely: None

GENERAL PERMIT CONDITIONS APPLICABLE

1) This permit is not transferable to any individual person or any other legal identity.

2) Any alterations to this permit shall immediately render it invalid.

3) This permit is deemed valid only:
a) in the original format as issued by the Director.

b) for the period as specified on the permit.

c) once the signature of the holder thereof has been endorsed thereon in ink.

4) The Director reserves the right to amend, withhold, withdraw or cancel any permit at any time.

5) This permit shall lapse / be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.

6) This permit, unless otherwise stated, is valid only within the boundaries of the Northern Cape Province and then specifically only for the property as specified on the permit.

7) This permit does not grant the permit holder automatic access to any Protected area, National Park, Provincial Nature Reserve or privately owned land. Any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion must also be adhered to.

8) The permit holder must at all times while performing any restricted activity have the permit and all relevant documentation in his / her possession.

9) Permits must be made available upon request of any authorized person. This person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection.

10) If applicable, the permit holder must within 21 days after performing the restricted activity furnish the Director with a written return as prescribed, with feedback on the results of the activity conducted.

11) If applicable, the permit holder shall apply for the renewal of the permit to the Director, on the appropriate application form, at least 3 months prior to the expiry date thereof.

12) The holder of this permit shall return the original to The Director: Permit Administration, Private Bag X6102, Kimberley, 8300, within fourteen days from the date of expiry thereof.

13) No new permit applications will be processed prior to the return of the original permit, once it has been used or once it has expired.

14) This permit is subject to the provisions of any law in force, during the period of validity of the permit, in respect of the specific area to which the permit applies.

15) This permit is subject to any applicable norms and standards in existence at the time of issuance of this permit.

16) It is the permit holder's responsibility to obtain information on any other legislation or changes thereto and any specifications or permit requirement that may be needed or required from any other department / organization / institute, for any activity as authorized by this permit.

17) It should be noted that any transgression, failure to render the required reports and or the return of the original permit, can jeopardize any future applications by the permit holder.

Signature of Issuing Authority

03 April 2014

(b) (6)

03/04/2014
Date of Signature

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(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 *(Cal) Tel: 027-341 1779 Fax: 027-341 1718* *(De Aar) Tel: 053-6310 601 Fax: 053-6310 343*

BYLAE 1 / ADDENDUM 1

18) If the holder of this permit contravenes or fails to comply with any permit condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

STANDARD PERMIT CONDITIONS APPLICABLE

HUNTING

1.□The permit holder may not allow the use of:

a)□a fire-arm having a barrel of a caliber of 6.5 mm (.256 of an inch) or less to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck.

b)□a fire-arm having a barrel caliber of less than 9.525 mm (.375 of an inch) to hunt any buffalo, elephant, lion, leopard, rhinoceros or hippopotamus.

2. When a hunter kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed.

3.□This permit can only be used and consider being valid after:

a)□The landowner has provided written permission to the hunter for the hunt.

b)□The landowner has provided written permission to the hunter / client to remove the carcass.

4.□Unless authorized in the game farm conditions hereunder or by a special permit to use prohibited hunting methods and / or instruments, the permit holder may not hunt, capture or catch any wild animal
a)□ by means of fire;
b)□ by means of poison;
c)□ by means of aircraft;
d)□ during the night
e)□ with the aid of an artificial light, floodlight or spotlight;
f)□ by means of any trap
g)□ by means of any snare;
h)□ by means of a spear, kierrie, stick or any similar device;
i)□ by means of a blowpipe or similar device;
j)□ by means of an air gun;
k)□by means of a fire-arm which discharges a rim-fire cartridge of a 5.6mm (.22 inch) caliber or smaller caliber;□
l)□by means of a fire-arm which discharges more than two shots without being manually reloaded;
m)□ by means of a shotgun, except for the hunting of birds;
n)□by means of a bow-and-arrow , cross-bow or similar device discharging an arrow or dart;
o)□ by means of a set gun or any similar device;
p)□by means of darting or any device which injects an intoxicating or a narcotic agent or poison into such animal;
q)□which is kept in captivity, confined to a cage, in an enclosure or trapped against a fence where the animal does not have a fair chance of evading the hunter;
r)□which is under the influence of any tranquilizing or narcotic immobilizing or similar agent;
s)□by the use of a dog, except for the hunting, flushing, pointing or retrieving of birds, or for the purpose of following or searching for any such animal which has been wounded;
t)□in the case of birds in or upon any aquatic systems, by the use of a boat for the purpose of chasing or killing such birds;
u)□by means of setting a set trap within 10 meters from a common boundary;
v)□by luring by means of a simulation or recording of the natural sound made by an animal or by means of bait or scent or any other induced luring method;
w)□in an area smaller than the set standard of 400 hectares, as determined by the Director from time to time;
x)□any other device of which the use would result in injuring or killing an animal in a way which is not humane;
y)□ by means of any other animal or bird of prey for the sport of falconry; or
z)□ by means of a firearm fitted with a silencer or similar noise-reduction device;

provided that in respect of the hunting of : -

i)□rodents, excluding porcupines and springhare, the provisions of paragraphs (b), (d), (e), (f), (g), (m), (q) or
ii) any wild animal by a registered veterinary surgeon in the practice of his or her profession, the provisions of paragraph (p) and (q), or
iii)□damage-causing animals as specified in Schedule 4, the provisions of paragraphs (d), (e), (f), (g), (p) (q) (r) and (v) shall not apply.

Signature of Issuing Authority

03 April 2014

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03/04/2014
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BYLAE 1 / ADDENDUM 1

GAME FARM CONDITIONS

1)□Any restricted activity, instrument and methods as authorized by the "Game Farm Standing Permit" does not apply to any listed CITES 1 species and / or species listed as Endangered according to the Schedules of the Nature and Environmental Conservation Ordinance 19 of 1974.

2)□Ordinance 19/1974 Section 36(a) – Rights of the landowner is hereby specified as follows:

a)□In accordance with Section 33(1) en (2) of Ordinance 19/1974, a motor vehicle or aircraft may be used for the hunting or capturing of a wild animal for management purposes.
□
b)□In accordance with the stipulations of Sections 29 of Ordinance 19/1974, the following prohibited hunting methods may be used namely:
i.□Hunting, culling or capturing with the aid of artificial light.
ii.□Hunt or capture during day and night.
iii.□Hunt by means of fire-arm which discharges a rim-fire cartridge of a caliber less than five comma six millimeters (e.g. a .22 fire-arm) only with regard to steenbuck, duiker and protected game birds.
iv.□Hunting / darting by means of any device which injects an intoxicating or a narcotic agent into such animal. This is only in as far as necessary for management purposes, disease control and the treatment or applying of medical procedures done by a registered veterinary surgeon in the practice of his/her profession. (Please note that any of the so called "Green hunts" are not permitted by this "Game Farm Standing Permit" and ordinary hunting permits must be applied for on an ad-hoc basis.

SPECIAL PERMIT CONDITIONS APPLICABLE

INTEGRATED PERMIT, STANDING PERMIT & REGISTRATION CERTIFICATE

1) This permit is an "Integrated Permit", as defined of Chapter 1 and issued in terms of Chapter 2, Regulation 4 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations, and;

2) This permit is a "Standing Permit", as defined of Chapter 1 and issued in terms of Chapter 2, Regulation 18 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations, and;

3) This permit is also a "Registration Certificate", as defined in Chapter 1 and issued in terms of Chapter 3, Regulation 33(1) and (2) of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations.

GAME FARM STANDING PERMIT

1) The property mentioned on this "Game Farm Standing Permit", is considered to be adequately enclosed as defined in Chapter 1 Section 2 and issued in terms of Chapter 4 Section 25 of the Nature and Environmental Conservation Ordinance 19 of 1974.

2) The property mentioned on this "Game Farm Standing Permit", is considered to be a "Registered Game Farm", as defined of Chapter 1 and in compliance with Chapter 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations.

3) The property mentioned on this "Game Farm Standing Permit", is considered to be a "Registered Wildlife Trader", as defined of Chapter 1 and in compliance with Chapter 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations.

4) If any of the following species appear on the "Game Farm Standing Permit", then the lifting of restricted activities is not applicable and such species is only listed for record purposes namely; Scimitar-horned Oryx, Arabian Oryx, Addax, Cape Mountain Zebra, Black-and White Rhinoceros, Oribi, African wild dog, Cheetah, Lion and Hyaenas. Please note that according to the departments approved translocation policy exotic animals can only be hunted or exported back to its country of origin.

5) No exemption for any restricted activity is applicable for the species as mentioned in paragraph three (3).

6) The permit holder must with sufficient notice to the Director, before any activity commences, apply on the prescribed application form, for a normal "ORDINARY Permit" to use any prohibited instrument or method or conduct any restricted activity with the species as mentioned in paragraph three (3). Such permit applications will be handled on ad hoc basis in compliance with new national legislation and policy guidelines.

7) The "Game Farm Standing Permit" authorizes the permit holder:
7.1) to issue a "Game Farm Hunting Permit / Permission" to a hunter;
7.2) to allow the hunter to hunt the applicable species on such property;

Signature of Issuing Authority

03 April 2014

(b) (6)

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

7.3) to sell the applicable species to a hunter.

GAME FARM HUNTING PERMIT / PERMISSION

1) The document herein referred to as a "Game Farm Hunting Permit / Permission" will be considered to be a "Game Farm Hunting Permit" as defined in Chapter 1 and 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations as well as a "Written Permission" and "Donation Document" as stipulated Section 39 and 41 of the Nature and Environmental Conservation Ordinance 19 of 1974.

2) The "Game Farm Hunting Permit / Permission" is only applicable for the particular species and specific property, as specified on the "Game Farm Standing Permit".

3) The permit holder is authorized to copy the "Game Farm Hunting Permit / Permission" document, as and when he / she my find need thereof.

4) The permit holder must allocate a series number for each "Game Farm Hunting Permit / Permission" issued by him / her, starting at number 0001 followed by the applicable year, e.g. 0001/2008.

5) The permit holder must keep record of all "Game Farm Hunting Permit / Permission" documents issued by him / her, in a file or register, according to the series numbers allocated per year.

6) The permit holder must BEFORE the hunt / selling / donation:
6.1) complete the hunter's or recipients particulars,
6.2) complete the species, sex and number of animals to be hunted / sold or donated;
6.3) sign and date each "Game Farm Hunting Permit / Permission" document that he / she issue;
6.4) hand over the original of such document to the hunter or recipient;
6.5) maintain a copy for record purposes.

7) The permit holder must AFTER the hunt / sale / donation:
7.1) indicate on the original document that was issued and all copies thereof, the species, sex and number of animals successfully hunted / wounded or lost / sold or donated;
7.2) sign and date the declaration as indicated on the "Game Farm Hunting Permit / Permission".

8) If the hunter is not a South African citizen (i.e. foreign client) then the permit holder must also complete the particulars of the Hunting Contractor and Professional Hunter involved.

9) The permit holder must on an annual basis, at the end of December of each year, submit to the Director, a copy of each "Game Farm Hunting Permit / Permission " issued by him / her.

10) If the permit holder fails to comply with any of these conditions the privilege to issue "Game Farm Hunting Permit / Permission" will be withdrawn immediately.

11) The "Game Farm Hunting Permit / Permission" authorizes the hunter or recipient:
11.1) to buy and or hunt the animal, and subsequent to the hunt / purchase or receipt;
11.2) to field dress, process, and transport the carcass;
11.3) to temporarily possess the dead specimen or derivative thereof, for a maximum period of 1 (one) year calculated from the day of the hunt / purchase / receipt.

12) The hunter or recipient must, at least 3 (three) months before the expiry of the 1 (one) year period, apply for a POSSESSION Permit, from the Director or applicable provincial department's issuing authority, in his / her province of residence, if still in possession of any carcass, derivative, part, specimen or trophy of the animal successfully hunted / purchased / received. The hunter or recipientr must return the original document together with his application for a possession permit.

13) The holder of such possession permit must on an ad hoc basis, apply for an ORDINARY Permit to carry out any additional / other restricted activity with any such specimen.

PERSONAL EFFECTS PERMIT / PERMISSION

1) The document herein referred to as a "Game Farm Hunting Permit / Permission" will be considered to be a "Personal Effects Permit / Permission" as defined in Chapter 1 and 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations as well as a "Written Permission" and "Donation Document" as stipulated Section 39 and 41 of the Nature and Environmental Conservation Ordinance 19 of 1974.

Signature of Issuing Authority

03 April 2014

(b) (6)

03/04/2014
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BYLAE 1 / ADDENDUM 1

2) The permit holder may only issue a "Personal Effects Permit / Permission" to a hunter or recipient for dead specimens originating from his / her property.

LION AND / OR RHINO HUNTS

ANIMAL INTRODUCTIONS:
1. A register must be kept in the prescribed format for all large predators and rhinoceros released onto and/or removed from the property.
2. Large predators originating from any intensive wildlife systems or controlled environments must not be brought or released onto the propert
3. In the case of lions & rhinoceros, every animal that are to be introduced, must be marked by a micro-chipping and photographed in an identifiable way, before such animal is released onto the property.
4. The origin of predators to be introduced must be such that there will be no threat to the genetic integrity of populations already occurring in the Northern Cape Province
5. In the case of lions, all future introductions will be limited to lions from the same geographical area.
6. Large predators that are to be introduced must only be released into the approved large predator camps when such electric fencing is fully functional.
7. Sufficient suitable prey species must be available to ensure survival of the large predators without such animals having to be fed in order to qualify as an extensive wildlife system.
8. Large predators must be declared free of disease by the State Vet before being introduced.

FENCING PATROLS
9. If a functional security alert system is in place fencing patrols must be done in such way that the whole outside perimeter is covered and an particular section of the fence is inspected at least once within a 72 hour period.
10. If no functional security alert system is in place fencing patrols must be done in such way that the whole perimeter is covered and any particular section of the fence is inspected at least once within a 24 hour period.
11. The fence must be maintained in such a manner that the large predators or rhinoceros remain adequately enclosed.

EMERGENCY PLAN / CONTINGENCIES
12. Any wild animal that has escaped from the property and has caused damage must be treated as a damage causing animal.
13. Standing written permission from the adjacent landowners must be obtained to cater for any emergency follow-up operations that might arise.
14. In case of any breach of the security fence by any large predator, at least the following emergency procedures must be followed and recorded:
- Intended plan of action;
- Immediate notification to surrounding landowners and adjacent communities;
- Contact the Department of Tourism, Environment and Conservation;
- Contact the South African Police Service;
- Procure a capture team and a qualified wildlife veterinarian;
- Procure two qualified Big 5 professional hunters to follow up and destroy the animal if necessary.

LIABILITY:
15. The permit holder and land owner accepts full responsibility for the introduction of the animal species to the property.
16. The permit holder and landowner is aware of the risks of releasing the animals species onto his/her property and the consequences which may result thereof.
17. The permit holder and landowner will not hold the Director or any official liable for any claims or costs which may incur as a direct result of the issue of a certificate of adequate enclosure permit pursuant to the above application.

HUNTING:
18. The permit holder and landowner must ensure that any large predator or rhinoceros which is hunted must not be a put and take animal an such animal must qualify to be free ranging (wild) for at least a period of 24 months prior to the hunting thereof.
19. No hunt may take place if not escorted by two Northern Cape Province registered professional hunters who are qualified to hunt Big 5 animals.
20. No hunting of a large predator or rhinoceros must be allowed if the official representative from the Director is not present.
21. Any official who attends the hunt has the full right to defend himself and anybody else should an emergency situation arise.
22. If the hunter belongs to any hunting organisation the hunt may only take place in an approved hunting area according to the code of ethica conduct and good practice as supported by such organised hunting fraternity.

PROHIBITED HUNTING METHODS:
23. No baiting or any luring of predator animals may take place.
24. No tame or captive bred large predator may be hunted.
25. No hunting of large predators or rhinoceros may take place from a vehicle or aircraft
26. No hunting of large predators or rhinoceros with bow-and- arrow may be allowed.
27. No hunting of predator animals may take place during the night or with the aid of an artificial light.
28. Close to or pressed against a fence or in any other a situation from which it has no escape.
29. No animal may be hunted which is under the influence of a tranquiliser, narcotic, immobilising or similar agent.

Signature of Issuing Authority

03 April 2014

(b) (6)

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

30. No other hunting method may be used to hunt an animal, if such method is prohibited by any applicable legislation.

SPECIAL ARRANGEMENTS FOR LARGE PREDATORS AND RHINOCEROS:
31. The Director must be notified in the prescribed format indicating the intended time of release as well as the specifics of the animal namely age, sex, microchip number and special identification markings.
32. The Director (or Mr. Wessel Jacobs 082 411 7179) must be notified in the prescribed format indicating the intended date and time of the intended hunt at least four weeks prior to the hunt.
33. The hunter must sign the prescribed declaration before the hunt commence. The original signed document will be submitted with the first copy of the hunting register. (No export of the hunting trophy will take place without submission of this document).

ADDITIONAL PERMIT CONDITIONS APPLICABLE

None

Signature of Issuing Authority

03 April 2014

(b) (6)

03/04/2014
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341 1718 (De Aar) Tel: 053-6310 601 Fax: 053-6310 343

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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July 8, 2019

RCVD JUL 15 2019 LB

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: PRT No. 06461D- Lion Trophy for Peter Zeliff, Republic of South Africa

Dear Chief Cogliano:

Please find enclosed a notice of representation for Peter Zeliff's application for a lion (*Panthera leo*) Trophy from Republic of South Africa.

PRT No. 06461D

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Notice of Representation, Peter Zeliff

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6) [redacted]

Name: Peter Zelfel

Date: 4/3/19

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-06461D

Enhancement Finding
Applicant: Peter Herbert Zeliff (PRT-06461D)

Peter Herbert Zeliff submitted an application on September 6, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Kalahai Oryx Private Nature Reserve, Northern Cape, South Africa for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of South Africa, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken in August 20, 2018, from this wild-managed lion (*P. l. melanochaita*) population within South Africa **meets** the enhancement criteria under 50 CFR 17.32.

U.S. Governance of the Lion:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes South Africa, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from South Africa, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in South Africa.

In evaluating the available data on lion hunting in South Africa, the Service understands that South Africa has three classifications for lions: wild, wild-managed, and captive-bred and classifies wild and wild-managed lions separately from captive-bred lions raised for hunting purposes since the management and oversight of these specimens is different within South Africa. Therefore, information relevant to the Service's consideration on whether to permit the import of a sport-hunted trophy from Kalarai Oryx Private Nature Reserve, a reserve which maintains a population of wild-managed lions, must be evaluated based on information pertaining to the management of wild and wild-managed lions in South Africa.

<u>General considerations:</u>

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in South Africa contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Zeliff's application involving a *P. l. melanochaita* sport-hunted trophy taken in Kalarai Oryx Private Nature Reserve, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita*

from Kalarai Oryx Private Nature Reserve. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues

to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Zeliff's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how South Africa's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also consider how a U.S. hunter's, in this case, Mr. Zeliff's, participation in the hunting program contributes to the overall management of lions within a country.

The management program in South Africa for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On January 12, 2016, the Service sent a letter to South Africa's Department of Environmental Affairs (DEA) with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in South Africa, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our January 12, 2016, letter, the DEA provided four documents. In addition, the Service met with representatives of DEA during the 17th Meeting of the Parties to the Convention in Johannesburg in late September 2016. Further, since those meetings, there have been several written exchanges with DEA discussing the DEA's evaluation of reserves with lions and how these animals conform to DEA's lion management plan. The four document provided to the Service in January 2016, along with the Service's own final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DEA, comments received from interested parties, and Mr. Zeliff's application were the basis of this finding.

South Africa has defined three populations of lions that exist within the country through their Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP; December 2015): *Wild lions,* who completely fulfill their role in biodiversity processes and are largely unmanaged, and exist only in formally proclaimed national parks and game reserves. This population's vital rates and demographics are not actively manipulated; *Wild-managed lions,* which include all lions that have been re-introduced into smaller fenced reserves (<1000km^2), and are managed to limit population growth and maintain genetic diversity. Some of the vital rates and demographics of these lions are actively manipulated; and *Captive lions*, bred for financial gain, where all vital rates and demographics of these populations are actively manipulated.

Governance of Lions in South Africa: The lion is listed as vulnerable in the South African list of Threatened and Protected Species (ToPS) under Section 56(1) of the National Environmental Management Biodiversity Act, 2004 (Act no 10 of 2004; NEMBA; BMP pg. 1). NEMBA further regulates a permit system regarding restricted activities involving specimens of listed threatened or protected species (Act no 10 of 2004; Chapter 7). Regulated activities in need of registration include, among others, captive breeding facilities, sanctuaries, scientific institutions, game farms, wildlife traders, wildlife product traders, taxidermists, wildlife translocators, and freight agents (NEMBA pg. 25).

NEMBA gives effect to the Convention on Biological Diversity (CBD), of which South Africa is a party, and Section 24 in the Bill of Rights of the Constitution of the Republic of South Africa (1996). Under Section 24(b): "everyone has the right to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development" (BMP pg. 15).

In addition to South Africa's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, South Africa provided a copy of their 2015 CITES non-detriment finding (NDF) for lions. Their finding, while focusing only on wild and wild-managed lions, applies to all lion exports from South Africa, including the captive lion population. This was clarified through personal communication with the South African Management Authority, where the Service was informed that the finding may be amended to better clarify that the finding applies to all lions within South Africa. A copy of the DEA's most recent lion NDF, dated January 23, 2018, which was included in a previous permit application, provides information on wild, wild-managed, and captive-bred lions and continues to find that the export of the species will not be detrimental to the survival of the species in the wild.

South Africa is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

In 1991, South Africa legalized private ownership of wildlife, leading to a significant rise in game ranches and farms. In 2010, private lands with wildlife covered approximately 16.8% of South Africa, compared to national and provincial protected areas accounting for only 6% (Cousins *et al.* 2010). It has been stated that this expansion of private lands and the wildlife industry resulting from the private ownership of wildlife is responsible for significantly increasing South Africa's large mammal populations (Crowley and Mokhema 2014). According to Crowley and Mokhema

(2014), South Africa's game ranching industry is worth $1.1 billion a year and is growing at 10 percent annually. The lion is listed as vulnerable in the South African list of Threatened and Protected Species (ToPS) under Section 56(1) of the National Environmental Management Biodiversity Act, 2004 (Act no 10 of 2004; NEMBA; BMP pg. 1). NEMBA further regulates a permit system of restricted activities involving specimens of listed threatened or protected species (Act no 10 of 2004; Chapter 7). Regulated activities in need of registration include, among others, captive breeding facilities, sanctuaries, scientific institutions, game farms, wildlife traders, wildlife product traders, taxidermists, wildlife translocators, and freight agents (NEMBA pg. 25). Depending on the requesting entity, the issuing authority is either the Minister (DEA) or the appropriate Provincial government (MEC). Under ToPS, wild lions should not be introduced into captivity. This permitting regime generates funds for national conservation efforts, while allowing landowners to profit from maintaining wildlife on their property. The landowners can then reinvest in the property by funding conservation efforts, managing wildlife, and carrying out anti-poaching efforts (Cousins *et al.* 2010).

Current Lion Status in South Africa: The lion was almost extirpated in South Africa by the early 1900s, remaining only in small numbers in what is now Kruger National Park (NP) and the Kgalagadi Transfrontier Park (TP). With the formation of Kruger NP in the 1920s, wild lion numbers slowly recovered, growing to the current population of approximately 1,700 lions (BMP, pg. 40). Kgalagadi TP has a stable, albeit smaller, population of approximately 400 lions, but is considered a lion stronghold in southern Africa. Lions recolonized Hluhluwe-iMfolozi Park (HiP) in the 1950/1960s and that population is currently stable at approximately 120 lions. Along with small groups of lions in Addo Elephant National Park, Karoo National Park, Marakele National Park, there are approximately 2,200 wild lions in South Africa. In addition, there are approximately 800 wild-managed lions separated among 45 fenced reserves of less than 1,000 square kilometers each (BMP pg. 40). It should be noted, however, that DEA is evaluating each of these fenced reserves to confirm that the lions maintained on the reserve can be classified as wild-managed. As such, the Service evaluated this application, in part, based on DEA's evaluation of the reserve where the lion was taken.

When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. These three threats led to the shrinking of lion populations and their range from pre-Colonial South Africa, to the current situation of lions being found predominantly on a limited number of national parks and fenced reserves. However, given the current focus of wildlife management practices in South Africa on fencing protected areas, additional habitat loss has been minimized. Further, due to more intensive management of the fenced reserves to maintain biodiversity, more stable prey bases and limited human-lion conflict are being observed.

According to South Africa's Scientific Authority's 2017 NDF published in January 2018, there are no specific official figures on the illegal trade in lions and lion products in South Africa, which is consistent with their 2015 NDF. There are currently no statistics relating to cases involving lions in the National Environmental Compliance and Enforcement Report, although there are cases currently under investigation. No recorded or known illegal trade in wild lion has occurred in Gauteng, KwaZulu-Natal or the Eastern Cape, and the illegal utilization of lions within South

Africa's national parks is negligible. However, according to the NDF, lions along the Kgalagadi Transfrontier Park boundaries have been persecuted for decades. Illegal trade in captive-bred lions within the North West Province is suspected to take place, as this industry is large and a challenge to regulate. The 2017 NDF does not discuss in further detail the reports referenced in the 2015 finding, regarding the illegal translocations of animals or trade in lions and their body parts for which offenders were not in possession of a permit to breed, keep, hunt, catch, sell, convey or export live animals or parts thereof. According to the 2015 and 2017 NDF, and supported by information in the Service's final listing rule, the illegal local and international trade in lions poses a moderate, but non-detrimental risk to the species in South Africa (BMP pg. 14; USFWS 2015, 80 Fed Reg. 79999).

To manage any population to maintain an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number of lions estimated to constitute a viable population is 500 individuals. Kruger National Park, with approximately 1,200 lions, has a stable population of wild lion and is considered a stronghold for lions in South Africa. Kgalagadi Transfrontier Park, with a stable population of approximately 400 lions, is considered a potential stronghold and conserves the genetic diversity within the Kalahari ecosystem (Bauer et al. 2008, in Riggio et al. 2013 (pg. 32); Bjorkland 2003 (pg. 515, 518). Wild lions in HiP, Addo Elephant National Park, Karoo National Park, and Marakele National Park, albeit smaller in size, appear to be stable, but would need to grow to be considered potential strongholds for maintaining genetic diversity. All of these populations receive very little direct management and hunting is not allowed within the National Parks (BMP).

Lion Management in South Africa: In 2015, in response to the requirements under NEMBA and the SADC Treaty, and after stakeholder workshops in 2013 and 2014, South Africa published the Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP) and stated that the "BMP for African lion will be regarded as the national strategy for African lions in South Africa" (pg. 2). The BMP was created in response to the Regional Strategy for Lions in East and Southern Africa in 2005 (IUCN SSC Cat Specialist Group 2006), which encouraged the development of national strategies aligned with national strategies of neighboring countries. The BMP was developed jointly by South Africa's Department of Environmental Affairs, Council for Scientific and Industrial Research (CSIR), and Dr. Paul Funston (Panthera). The current BMP is the first in a series of five-year iterations, as required under NEMBA, where the success of the preceding five years will be measured, and adaptations made to ensure that the plan for the following five–year period is appropriate for the circumstances at the time.

The BMP has identified the vision that "…lions will provide key opportunities for biodiversity conservation, economic development, social benefits, and improved management capacity." The BMP lays out five specific objectives for the conservation of wild and wild-managed lions within South Africa:

- Improve the conservation status of lions within the broader conservation context.

- Develop and implement effective communication tools that are informed by scientific research (communication, education, and public awareness).
- Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws.
- Establish a lion forum or working group.
- Collaborate the alignment of this BMP with lion conservation plans in neighboring countries and link with international working groups.

All five of these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the party responsible for implementation. The BMP will be re-evaluated in 2019 to assess the success of the plan and to modify the BMP for 2020 to 2025 accordingly.

While these five objectives appear to serve a valuable role in lion management in South Africa, two are most relevant in determining if the implementation of the BMP enhances the propagation or survival of the species, as required by the Act for the issuance of this import permit. The first objective, "Improve the conservation status of lions", has been broken down into three sub-objectives for wild and wild-managed lions: maintain current protection status of lions; reassess the conservation status of lions; and enhance the conservation status of wild lions. The intended 5-year outcomes of these sub-objectives are to have stable wild lion populations in all protected areas with no illegal trade in wild lions, have more than 80% of all reserves with wild-managed lions integrated into a managed meta-population approach for genetic management, publish norms and standards for the management of wild-managed lions, and a stronger understanding of wild-managed lion population size and trends. To achieve these sub-objectives, South Africa has already conducted population surveys of wild lions in 2015 and will census every 3 years. They have also started implementing the managed meta-population plan with the goal of over 80% of reserves included by 2019. The norms and standards for the management of wild-managed lions was to be completed by the end of 2016 and the first audits to obtain a stronger understanding of wild-managed lion population trends was completed in 2015 and is supposed to continue annually thereafter. One of the first outcomes of these evaluations has been the apparent tightening of how DEA assesses whether a reserve holds "wild-managed" lions or if the lions on a reserve are considered "captive-bred". As such, the Service consulted with the DEA on whether the reserve identified in this application where the trophy animal will be taken maintains wild-managed lions.

The second objective, "Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws", identifies two actions: ensure alignment on permitting decisions between national and provincial legislation; and address and implement training needs for all aspects of legislation regarding lions. The intended 5-year outcome of these two actions is to have well-trained managers that make better management decisions, and effective legislation to support lion conservation and sustainable utilization of lions.

The BMP has two additional objectives focusing specifically on wild-managed lions. As with the objectives discussed above, these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the parties responsible for implementation. The first is to maintain the wild-managed lions as a key population that

contributes to socio-economic-ecological opportunities through mimicking "natural" ecological functions (e.g., wild lion survival rates, fecundity, litter sizes, and mortality rates). This objective is broken down to a number of action items ranging from mimicking survival changes through lethal and non-lethal removals, mimicking required immigration/emigration into an area, and measuring demographic responses by determining age- and sex-structure through ranger observations, and informing stakeholders on progress of management efforts. These action items predominately have target dates that are on-going, annual, or bi-annual, with outcomes that can be used- in adaptive management efforts.

The second wild-managed lion objective is "To maintain lion genetic integrity by inducing social limitations through management-assisted dispersal and changes in dominance hierarchies", which focuses primarily on ensuring that lions within smaller fenced areas (<1,000 sq. km.) mimic natural biological processes such as natural dominance hierarchies and female dispersal to ensure genetic diversity. The action items for this objective include modeling genetic diversity within reserves, mimicking male dispersal from and into a social unit through removal (e.g., culling/hunting or translocation) and introduction (translocation) of males at appropriate ages, and mimicking occasional female dispersal into social units through removal and introduction.

The BMP has information on the lion's biology, habitat requirements, threats, and relevant legislation, as well as an extensive chapter on wild-managed lions. This chapter explores the history of wild-managed lions, particularly how lions had been managed in the past and what actions are needed to move forward in establishing a meta-population through connecting the reserves and allowing for genetically viable populations that can contribute to the overall wild lion population. According to the BMP, the wild lion populations are complemented by a fragmented population of wild-managed lions in South Africa found on fenced areas or reserves typically less than 1,000 square kilometers in size. This largely results from private property as well as wildlife ownership rights enforced by fencing as required by South African law. According to the BMP, even though opinions vary on the pros (Packer et al. 2013) and cons (Creel et al. 2013) of fencing as an essential component of range-wide lion conservation in the future, the use of fences is likely to increase as human land use continues to expand into lion ranges. The expanded use of fencing, particularly in areas where fencing is currently not widely utilized, could lead to continued fragmentation of lion habitats (Riggio et al. 2012, Dolrenry et al. 2014). Therefore, wild-managed lions in South Africa provides a key example on how to achieve integrated lion conservation goals in a changing African context that would enhance the survival of the species.

In the 1990s, the number of public and private game reserves started to increase in South Africa and many of them reintroduced lions, mostly as a tourist draw. Lions from these populations were then used for yet more reintroductions leading to a current number of about 800 lions on over 45 fenced reserves (Miller et al 2013). Many of these reserves have only one or two prides of lions, with the largest (Pilanesberg National Park and Madikwe Game Reserve) having four or five prides. Historically, most managers of these reserves had the tendency to manage their lion populations in isolation, although there was some movement of 'excess' lions.

Because of fragmented, isolated management of these populations, the conservation value of these lions has been questioned in the past (Hunter et al 2007, Slotow & Hunter 2009). Because of this,

the BMP sets out management criteria within the reserves that maintains ecological processes and creates a meta-population (BMP pg. 41 and 42). Researchers noted indicators of inbreeding in two reserves (Trinkel et al. 2008, 2010), while several reserves experienced increased lion population growth rates with subsequent high lion densities (Miller & Funston 2014). The combination of high lion densities and restricted size of the reserves disrupts predator-prey relationships – often with prey dramatically declining (Tambling & du Toit 2005, Slotow & Hunter 2009). In addition, managers increasingly find it hard to locate new areas for 'excess' lions (Kettles & Slotow 2009). The Lion Management Forum (LiMF), founded in 2010, provides a platform for concerned managers to discuss the unique issues surrounding small, fenced lion populations. LiMF members recognize that many of the natural processes characteristic of large naturally functioning lion populations have been disrupted on these small reserves. Given the small sizes of these reserves, limited opportunities exist for restoration of these natural processes Therefore, LiMF, and the BMP, have put forward management interventions that would mimic the outcomes of natural processes that are showing great success (Miller et al. 2013; Ferreira & Hofmeyr 2014).

The BMP recognizes that the managed lion meta-population is slightly contradictory to the theory of meta-population dynamics, as meta-populations are those with spatio-temporally variable subpopulation dynamics, variable dispersal, and availability of empty habitats that are largely connected (Oliveier et al. 2009). That is not the case with most wild-managed lion populations on small reserves in South Africa. Thus, in essence, the managed meta-population is a unique product of the South African response to managing and conserving large carnivores on isolated small reserves. The approach essentially recognizes a single population with social groups spatially isolated over vast areas. Some of these challenges can be reconciled through identifying regional nodes.

The lions for reintroductions into South Africa's small reserves were initially sourced from Etosha National Park, as well as Sabi Sand Game Reserve, adjacent to the Kruger National Park. Recently, SANParks relocated some animals from the South African park of Kgalagadi Transfrontier Park (Slotow & Hunter 2009). Managers applied minimal genetic management throughout the history of lion reintroductions (Slotow & Hunter 2009, Trinkle et al. 2010). As a result, geographic genetic structure in the wild-managed lion meta-population reflects mixed origins with few reserves having lions of only one origin (Miller et al. in review). The South African wild-managed lions thus represent a novel lion genetic diversity not associated with a single origin. Maintaining the origin of the base genetic stock is thus, according to the BMP, a low priority (BMP pg. 45).

Hunting and Utilization:

Hunting: According to the 2017 NDF (the last assessment available to the Service), hunting of wild lions is not allowed within national parks and only limited hunting is allowed in some provincial reserves, effectively ensuring protection for the majority of wild lions. There is some harvest of wild lions for the control of problem animals (e.g., stock-raiding) and, in very limited cases, population management within the national parks. In addition, a small number of wild lions from Kruger NP have dispersed out of the park into some of the reserves surrounding the park and may be harvested. According to the BMP, fewer than 2 wild lions and only approximately 10 wild-managed lions are taken off of private reserves annually.

South Africa has not set a specific annual quota for wild-managed lions. Instead, according to information provided to the Service, authorizations for hunting wild-managed lions are addressed on a case-by-case basis. Reserves maintaining wild-managed lions must submit an application to the provincial authorities requesting a permit. Professional Hunters are obliged to record all completed hunts in a professional hunting register and this register is used to compile provincial reports on the number of lions taken annually. The level of off-take is also evaluated in the management of the meta-population to ensure that only those animals that no longer meet management goals are removed from the population. These animals are typically older lions that have successfully bred and raised several litters of kittens. Most experts consider the recommendation by Packer *et al.* (2011, p. 151) to limit offtake to no more than 1 lion per 2,000 km^2 to be a sustainable offtake of lions. The BMP (pg. 29) has established more restrictive limits for areas of less than 1000 km^2 to not exceed 0.5 lions/1000 km^2.

Utilization: An active lion bone trade from South Africa to several Asian countries for traditional medicinals is primarily supplied from captive-bred lions taken as hunting trophies, as well as captive-bred lionesses and juvenile lions (BMP pg. 30; 2017 NDF pg. 13). Lion bones are being used as a substitute for tiger bones, which is highly valued in Asia, primarily in China and Vietnam (Williams et al. 2015, pg. 1; Gratwicke et al. 2008, pg. 2–5; Graham-Rowe 2011, pg. s101–s102). In 2008, South Africa began issuing CITES permits for the export of skeletons of captive-bred lions to Asia. The number of lion skeletons for which South Africa issued permits for export to Asia (China, Viet Nam, Thailand and Lao PDR) increased tenfold from 2008 to 2011, from about 50 to about 573 skeletons, respectively, representing a total of 1,160 skeletons or about 10.8 metric tons (11.9 US tons) of lion bone in 4 years (Williams 2015, pp. ix–x, 46). With respect to meeting demand for lion bone, Lindsey et al. (2012, p. 20) states that there are likely to be large numbers of lion bones available for export from game farms, from lionesses and non-trophy males, and as byproducts from animals shot as trophies. In addition, Williams et al. (2015, p. 41) reports that there may be between 1,400 and 6,200 lion skeletons from past trophy hunts on South African game farms that could potentially be used to supply demand for lion bone. Further, at the 17th Meeting of the Conference of the Parties, the Appendix II listing for *P. leo* was amended to include an annotation establishing an export quota for lion bones. The annotation states that "[A] zero annual export quota is established for specimens of bones, bone pieces, bone products, claws, skeletons, skulls, and teeth removed from the wild and traded for commercial purposes. Annual export quotas for trade in bones, bone pieces, bone products, claws, skeletons, skulls and teeth for commercial purposes, derived from captive breeding operations in South Africa will be established and communicated annually to the CITES Secretariat." The Service is aware of a press release from the Endangered Wildlife Trust in which they state the DEA has established a quota of 800 skeletons (with or without skulls) of captive-bred lions for international trade, and as of this finding, the CITES website shows that South Africa has communicated a 800 skeleton export quota for 2017 and 2018 to the CITES Secretariat. Although the bone trade is supplemented from skeletons from trophies, with a reduction in scheduled trophy hunts from oversees due to increased regulations in certain countries, including the U.S., some South African farms are turning to culling for the bone trade to supplement income lost from a reduction from trophy hunting (Williams and Sas-Rolfes pg. 14-16 & 18-21). Additionally, Williams and Sas-Rolfes have identified that industry participants who are relying on income from the bone trade may not

distinguish between sourcing the legal or illegal bone trade if frustrations regarding the current quota were to reach a turning point (pg. 16).

While the BMP suggests that the value of bones, whether wild or captive, is not high enough to stimulate the illegal harvest of lions solely to sell the bones into the bone trade, there is the potential that if the value of bones increases due to increasing demand from Asian markets, that captive lions could be a legal source of bones that masks the illegal harvest of wild lions. Additionally, evidence suggests that there may be incentive to poach wild lions for the bone trade. According to Williams et al. (2015, p. x), the 2013 price paid to South African game farmers and landowners for lion bones was $1,260–2,100 USD per skeleton. In many lion range states, this exceeds per capita GDP (gross domestic product) (World Bank 2015, unpaginated). Further, Williams and Sas-Rolfes show from data gathered directly from facilities that prices have been consistently rising over the last five years, at a rate that is significantly higher than the official inflation rates in both the producer and consumer countries (pg. 23). Thus, the current price paid for lion bone may provide incentive in some countries to poach wild lions. While the lion bone trade appears to currently be based primarily in South Africa's captive lion hunting industry, the trade appears to be having little or no impact on wild lion populations in South Africa at this time—lion populations in South Africa are stable or increasing and there is little poaching of wild lions in the country (Funston and Levendal 2015, pp. 1, 26; Williams et al. 2015, pp. 79–80). However, the impact of the lion bone trade on lion populations outside South Africa is unknown. Based on the effect of the tiger bone trade on tiger populations, if current conditions—for example, rapidly increasing demand and involvement of an international crime syndicate in the lion bone trade (Final listing rule, pg. 80026) —continue unchanged, then there is considerable potential for extensive poaching of wild lions to occur in order to meet demand.

Evaluation:

As stated earlier, the Service has evaluated this application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild-managed lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

While there is habitat available to lions on the national parks and within the smaller, fenced reserves, much of South Africa has been converted into agricultural uses, managed plantation forests, human developments, or extractive industries. With the legalization of private ownership of wildlife in the early 1990s, there has been a significant increase in private land set aside for wildlife. This has led to a boost in South Africa's wildlife, particularly large mammals. South

Africa laws, such as ToPS, were put into place to ensure that utilization of this wildlife is sustainable and provides for long-term incentives to maintain these areas for wildlife protection. The national parks and fenced reserves are natural areas surrounded by development. It is only through the on-going management of these remaining natural areas that lions survive in South Africa. South Africa's management of wild and wild-managed lion population as a meta-population, using human intervention (e.g., translocation) as a substitute for natural occurrences (e.g., dispersal), is ensuring that lion populations are genetically healthy and viable.

While it has been stated that South Africa's hunting industry generates $1.1 billion annually, not all of this is connected to lion hunting or to United States hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and a draw for United States hunters, such as Mr. Zeliff, to South Africa. Based on the information available to the Service, the presence of private reserves has increased the number and diversity of wildlife in South Africa, thus fueling the hunting industry, which funds the on-going success of private reserves. It appears that without the hunting industry, these reserves, which have become islands of wilderness surrounded by civilization in much of South Africa, would not be economically viable, and therefore would not exist. Both ToPS and the BMP have put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in South Africa. With an annual harvest of approximately 10 wild-managed lions, South Africa is not exceeding the limits identified in the BMP of 0.5 lions/1,000 sq. km. The objectives of the BMP and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that South Africa has established for managing lions.

Therefore, based on the information available to the Service and seeing that Kalarai Oryx Private Nature Reserve has been determined by the DEA to maintain a wild-managed lion population, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:</u>

The national management plan, the BMP for lions is extensive and addresses many aspects of lion conservation and management. As reviewed above, the BMP provides a history of the relevant legislation with regards to lion conservation and puts the current efforts into context. The BMP also reviews the species' biology, population status, habitat requirements, and threats to lion populations. Objectives for conservation of the species, as well as a plan to develop a meta-population for wild-managed lions, are also included. Additionally, the monitoring plans have scientifically sound methodologies. Lastly, but equally importantly, are the monitoring and evaluation efforts laid out in the BMP.

In evaluating the information provided by the South African government and other sources, it appears that the hunting program in South Africa is addressing the three main threats identified by the Service when making the determination that the species is threatened with the possibility of extinction. The fenced reserves, including Kalarai Oryx Private Nature Reserve and national parks are maintaining habitat for lions and ensuring that there is no further habitat loss, provided that the reserves can remain economically viable. In order to maintain a viable population of wild and wild-managed lions, the parks and reserves must maintain biodiversity and a sustainable prey base. Finally, while there is still controversy over the extensive utilization of fencing in South Africa, it does reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions on these reserves and, the limited hunting of lions under this management program contributes to the on-going survival of the species in South Africa.

The off-take of this wild-managed lion provides an indirect benefit to wild populations by helping to support the reserve where lion populations participating in the meta-population management are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, South Africa is closely monitoring and controlling the harvest of wild and wild-managed lions through permitting under ToPS and through the BMP. The issuance of an import permit for a wild-managed lion legally hunted in Kalarai Oryx Private Nature Reserve under these authorities would not conflict with any programs intended to enhance the survival probably of the species in South Africa.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted wild-managed lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, wild lions only occur in a limited number of national parks in South Africa and wild-managed lions are currently found on 45 reserves of less than 1,000 sq. km. While the wild lions on the national parks receive only limited direct management activities, the reserves require management that is more intensive in order to mimic natural biological and ecological roles of lions. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the presence of these reserves, including Kalarai Oryx Private

Nature Reserve, as well as the parks, is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. While the concept of lions behind fences has both benefits and drawbacks, it appears to be a major contributor to the on-going survival of lions in the wild in South Africa. While open and unmanaged habitat not impacted by human intervention would be the ideal conditions for lion populations in South Africa, as well as throughout its natural range, this is not currently a viable option within South Africa.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt that Mr. Zeiff has undertaken in will contribute to reducing the threat of extinction of lions in South Africa. It appears that the permitting activities under ToPS and the implementation of the BMP will ensure the long-term survival of lions. The utilization of hunters such as Mr. Zeliff in managing the populations on these reserves is an important element of the success of lion management in South Africa.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduced the threat of extinction facing lions in South Africa.

17.32(a)(2)(v): <u>The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:</u>

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions, but particularly captive-bred lions. However, this opposition, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that the legal harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

Based on our understanding of the permitting process under ToPS, reserves that maintain wild-managed lions must establish biodiversity plans for managing the reserve that takes into consideration the long-term survival of all species on the reserve, including large predators. This oversight by DEA and the implementation of the BMP establishes a framework in which reserves manage their wildlife. The long-term survival of lions, at least in South Africa, is tied directly to the success, both ecologically and economically, of the reserves. The reserves that have been permitted to maintain wild-managed lions and, as part of the management program, carry out limited hunting, have the expertise and facilities to maintain lions successfully. This includes Kalarai Oryx Private Nature Reserve, a participant in the meta-population management of wild-managed lions.

Therefore, based on the information available to the Service, the applicant intends to hunt on a properly permitted reserve that carries out their management practices in accordance with national and provincial regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective states in the application.

Conclusion

Given the current status of wild and wild-managed lions within South Africa and the level of management and oversight provided to them, it appear that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant intends to hunt on a properly licensed reserve that is actively managing lions in a manner that will maintain the species on the reserve, and through the national meta-population management plan, in a manner that mimics natural processes.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild-managed lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild-managed lion trophy taken in South Africa, to Peter Herbert Zeliff, Batavia, NY.**

Emma Nelson 8/28/19
Emma Nelson, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 8/28/19
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Bauer, H., Nowell, K., & Packer, C. (2008). Panthera /eo, IUCN 2010. IUCN Red List of Threatened Species. Version 2010.4.

Biodiversity Management Plan for the Lion (Panthera leo) in South Africa (BMP; December 2015): Funston, P. J. & Lavendal, M. (2015). Biodiversity Management Plan for the Lion (Panthera leo) in South Africa. Department of Environmental Affairs, Republic of South Africa. 63 pp

Bjorklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (Panthera leo) Conservation Genetics, 4, 515-523

Cousins, J. A., Sadler, J. P., and Evans, J. (20 l 0). The challenge of regulating private wildli fe ranches for conservation in South Africa. Ecology and Society XX(YY): ZZ. [online] URL: https://www. researchgate.net/profiIe/Jo nathan _Sad le r/pub lication /44854322_The_Challengc_ o(_Regu lat ing_ Pr ivate _ Wil dli fe_Ranches _for_Conservation_in _ So uth _ Afric a/li nks/0c 96051 4ca0b 84f295000000.pdf

Creel, S., Becker, M. S., Durant, S. M., M'soka, J., Matandiko, W., Dickman, A. J., & Stanley Price, M. (2013). Conserving large populations of lions-the argument for fences has holes. Ecology letters.

Crowley, K., and Mokhema, T. (2014). Lions Hunted to Save Rhinos in South African Circle of Life. Bloomberg [online] URL: http://www.b loo mberg.co m/news larticles/2014-08 -19 /lio ns-h untc d- to-preserve-rhinos-in-south-african-circle-of-life

Department of Environmental Affairs, Scientific Authority of South Africa. 2017. Non-detriment Finding Assessment for Pathera leo (African lion). No. 41393.

Dolrenry, S., Stenglein, J., Hazzah, L, Lutz, R.S. and Frank, L. 2014. A Metapopulation approach to African lion (Panthera leo) conservation. PLoS ONE 9(2): e88081. Doi: 10-1371/ joumal.pone.0088081.

Ferreira, S.M. and Hofineyr, M. 2014. Managing charismatic carnivores in small areas: large felids in South Africa. South African Journal of Wildlife Research 44(l):32-42.

Graham-Rowe, D. (2011). Endangered and in demand . Nature 480 (22 December 201 l): st 01-s103.

Gratwicke, B., Mills, J., Dutton, A., Gabriel, G., Long, B., Seidensticker, J., Wright, B., You, W. & Zhang, L. (2008). Attitudes toward consumption and conservat io n of tigers in China. PLoS ONE 3 (7): e2544.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Ricke lton, M., Walker, C., Slotow, R. and Skinner, J.D. (2007). Restoring lions Panthera leo to northern KwaZulu-Nata l, So uth Africa: short- term biological and technical success but equivocal long-telTil conservation. Oryx 41: 196-200.

IUCN Species Survival Commission (2012). Guiding Principles o n Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN Species Survival Commission (SSC) Cat Specialist Group. (2006a). Regional Conservatio n Strategy For The Lion Panthera leo In Eastern and Southern Africa. 60 pp.

Kettles, R. and Slotow, R. (2009). Management of free-ranging lions on an enclosed game reserve. South African Journal of Wildlife Research 39:23-33.

Lindsey, P., Alexander, R., Balme, G.A., Midlane, N. & Craig, J. (2012b). Possible relationships between the South African captive-bred hunting industry and the hunting and conservation oflions elsewhere in Africa. South African Journal of Wildlife Research 42 (1), 11-22.

Miller, S.M., Bissett, C., Burger, A., Courtney, B. and Dickerson, T. (2013). Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and best practice guidelines. South African Journal ofWildlife Research 43(3):138-154.

Miller, S.M and Funston, P.J. (2014) Population growth rates oflions (Panthera leo) on small fenced reserves in South Africa: a management dilemma. South Africa Journal of Wil dlife Research 44:43-55.

Oliveier, P.J., Van Aarde, R.J., and Ferreira, S.M. (2009) Support for a metapopulation structure among mammals. Mammal Review 39:178-192.

Packer, C., Brink, H., Kissui, 8. M., Maliti, H., Kushn ir, H., and Caro, T. (2011) Effects of trophy hunting on lions and leopards in Tanzania. Conservation Biology. 25:142-153.

Packer, C., Swanson, A., Canney, S., Loveridge, A., Garnett, S., Pfeife r, M., ... MacNulty, D. (2013). The case for fencing rema ins intact. Ecology Letters 16 : 1414-e4.

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., ... Pimm, S. (2013) . The size of savannah Africa: a lion ' s (Panthera leo) view. Biodiversity and Conse, n ation, 22(1), 17-35.

Slotow, R. and Hunter, L.T.8. (2009) Reintroduction decisions taken at the incorrect social scale devalue their conservation contribution: the African lion in South Africa. in: M.W. Hayward and M.J. Somer (eds). Reintroduction of Top-Order Predators. pp. 41-73. Wiley-Blackwell, Oxford.

South Africa (2004). National Environmental Management Biodiversity Act 10 of 2004. www.gpwonline.co.za

Tambling, CJ. and du Toit, S.T. (2005) Modelling wildebeest population dynamics: Implications of predation and harvesting in a closed system. Journal of Applied Ecology 42:431-441.

Trinkel, M., Ferguson, N, Reid, A., Reid, C., Somers, M. et al. (2008) Translocating lions into an inbred lion population in the Hluhluwe iMfolozi Park, South Africa. Animal Conservation 11:138-143.

Tinkel, M., Funston, P., Hofineyr, M., Hofineyr, D., Dell, S., Parker, C., and Slotow, R. (2010) Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13:374-382.

USFWS (2015) Final ESA listing rule for Panthera lea leo and P. I. melanochaita. 80 Fed. Reg. 79999.

Williams, V.L, 't Sas-Rolfes, M.J. (2019). Born captive: A survey of the lion breeding, keeping and hunting industries in South Africa. PLoS ONE 14(5): e0217409. http://doi.org/10.1371/journal.prone.0217409

Williams, V.L., Newton, DJ., Loveridge, A.J., & Macdonald, D.W. (2015). Bones of Contention: An Assessment of the South African Trade in African Lion Panthera leo Bones and Other Body Parts. TRAFFIC, Cambridge, UK & WildCRU, Oxford, UK.

World Bank. 2015. The World Bank Annual Report 2015. Washington, DC. © World Bank. https://openknowledge.worldbank.or g/handle/10986 /22550 License: CC BY 3.0 IGO.

Under provisions of section 7(a)(2) of the Endangered Species Act, a Federal agency that permits, licenses, funds, or otherwise authorizes activities must consult with the Fish and Wildlife Service as appropriate, **to ensure that its actions will not jeopardize the continued existence of any listed species.**

The Act states that each federal agency shall insure that any action authorized ... **"is not likely to jeopardize the continued existence of any endangered species or threatened species** *OR* result in the destruction or adverse modification of habitat of such species which is determined ...to be critical...."

Intra-Service Section 7 Biological Evaluation under ESA
Division of Management Authority

Originator: Emma Nelson
Date: August 13, 2019
Application Number: 06461D

I. Listed species and critical habitat (if any) potentially affected:

The applicant requests a permit to import one male sport hunted lion trophy (*Panthera leo melanochaita)* taken within Kalahai Oryx Private Nature Reserve, Northern Cape, South Africa during the 2018 hunting season for the purpose of enhancement of the species.

Scientific name:
Panthera leo melanochaita

Common name:
African lion

Date listed:
12/23/2015- T

Description of species, threats, and critical habitat:
The lion has a broad habitat tolerance, absent only from tropical rainforest and the interior of the Sahara desert. There are records of lions to elevations of more than 4,000 m in the Bale Mountains and on Kilimanjaro. Although lions drink regularly when water is available, they are capable of obtaining their moisture requirements from prey and even plants (such as the tsama melon in the Kalahari desert), and thus can survive in very arid environments. Medium- to large-sized ungulates (including antelopes, zebra and wildebeest) are the bulk of their prey, but lions will take almost any animal, from rodents to a rhino. They also scavenge, displacing other predators (such as the spotted hyaena) from their kills.

Lions are the most social of the cats, with related females remaining together in prides, and related and unrelated males forming coalitions competing for tenure over prides. Average pride size (including males and females) is four to six adults; prides generally break into smaller groups when hunting. Lions tend to live at higher densities than most other felids, but with a wide variation from 1.5 adults per 100 km² in southern African semi-desert to 55/100 km² in parts of the Serengeti. Pride ranges can vary widely even in the same region: e.g., from 266-4,532 km² in the Kgalagadi Transfrontier Park of South Africa.

The main threats to lions are indiscriminate killing (primarily as a result of retaliatory or pre-emptive killing to protect human life and livestock), prey base depletion, habitat loss, illegal trade in lion parts, trophy hunting (depending on management), and disease. Habitat loss and

conversion has led to a number of subpopulations becoming small and isolated. Furthermore, trophy hunting has a net positive impact in a some areas, but may have at times contributed to population declines in Botswana, Namibia, Tanzania, Zimbabwe, Cameroon and Zambia.

The economic impact of stock raiding can be significant and therefore lions are persecuted intensely in livestock areas across Africa; their scavenging behavior makes them particularly vulnerable to poisoned carcasses put out to eliminate predators. Little actual information exists on the number of lions killed as problem animals by local people, even though this is considered the primary threat to their survival outside protected areas.

Lion population density across the species' range is known to track the biomass of large wild herbivores, the lion's principle prey species. These species are increasingly under threat from an unsustainable and increasingly commercialized bushmeat trade, leading to collapses in prey populations across large parts of savanna Africa.

Illegal trade in lion body parts for medicinal purposes is considered a threat to African lion subpopulations (according to the regional lion conservation strategies, which call on countries to prohibit and control trade in lion bone and other parts and products) as well as to the small subpopulation in India's Gir Forest. In West and Central Africa, there are many reported uses for lion skins and bone in Benin (with fat and bones being most commonly utilized), and a survey carried out around Nigeria's Yankari National Park found more than 22 lion parts considered to be of medicinal value, with most of the over 200 interviewees saying they had used lion parts in the past, and half within the past three years. The widespread prevalence of fakes in the traditional medicinal market is indicative of a continued demand. While fakes may replace items in the market that otherwise would be illegally sourced from the wild, they could perpetuate demand and poaching when consumers aspire to the genuine wild item rather than making a conscious choice of an (often cheaper) alternative.

There appears to be increasing interest in the use of African lion bone in Asia. There is no history of lion bone being used in traditional medicine there, but China has permitted the use of bones from captive lions to make medicinal wines traditionally containing tiger bone. South Africa has reported the export of large quantities of lion bone sourced from captive animals to China, the Lao People's Democratic Republic and Viet Nam. Legal international trade in bone reported as from captive-bred lions could serve as a cover for illegally wild-sourced lion (and other big cat) parts. There is also concern that wild lion parts from eastern and Southern Africa could be drawn into the large illegal wildlife trade to Asia centered around elephant ivory.

Trophy hunting is carried out in a number of sub-Saharan African countries and is considered an important management tool for conserving wild land providing financial resource for lion conservation for both governments and local communities. However, there is concern that management regimes have not always been sufficient to deter unsustainable offtakes. A sustainable offtake level of one male lion per 2,000 km² has been recommended, but offtake has been higher in many areas, which suggests that it is potentially a threat. Trophy hunting can thus be a tool for conservation but also a threat, depending on how it is regulated and managed. Hunter et al. (2013) cautioned that regulatory measures which reduce the profitability of lion trophy hunting could have widespread negative impacts for wildlife-based land use, anti-poaching and tolerance of lion outside protected areas.

No critical habitat has been designated.

II. Geographic area where action will occur:

Kalahai Oryx Private Nature Reserve, Northern Cape, South Africa

III. Description of the proposed action:

The applicant requests a permit to import one male sport hunted lion trophy (*Panthera leo melanochaita)* taken within Kalahai Oryx Private Nature Reserve, Northern Cape, South Africa during the 2018 hunting season for the purpose of enhancement of the species.

IV. Determination of effects:

A. Explanation of effects of the action on species and critical habitat in item I:

The import of the sport-hunted trophy will have no effect.

B. Explanation of actions to be implemented to reduce adverse effects:

The action will have no effect.

V. Effect of determination and response requested:

A. Determination

No effect.
Species: African lion (*Panthera leo melanochaita*)

Prepared by

Emma Nelson 8/13/19

Emma Nelson, Biologist — Date
Division of Management Authority

Concurrence

Mary Crigler 8/28/19

Chief — Date
Division of Management Authority

Research:

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2016. *Panthera leo* (errata version published in 2017). *The IUCN Red List of Threatened Species* 2016: e.T15951A115130419. http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T15951A107265605.en. Downloaded on 13 August 2019.

LION SOUTH AFRICAN ESA TROPHY

Permit Number: MA06461D-0

Effective: 08/28/2019 Expires: 08/27/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coffland

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

PETER HERBERT ZELIFF
(b)(6) [redacted]
BATAVIA, NY 14020
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539(a); 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in South Africa for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD SEP 10 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hettervig	Mark	J.	

(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)

(b)(6) [redacted]

1.	d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tenino	WA	98589-9800	Thurston	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

(b)(6) [redacted]

	nty/Province	2.f.Country
Milwaukie	OR	97222	Clackamas	USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ...ify that the information submitted in this application for a permit is complete and ...statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) [redacted]

9/20/18

...d signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor)

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Marcie Helton (b)(6) [redacted]

(b)(6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera Leo

   b. Sex (if known). males (3)

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Mozambique
   Mosahmanzou Safaris
   Terminal de carga aeroporto Biera

   b. Date wildlife is to be hunted:

   Aug. 31st - Sept. 25th, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   mosahmbanzou Safaris
   Grant Taylor

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Please see attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
   Name:
   Business Name: Safari Cargo Systems
   Address: Holding 34, 5th Ave.
   City: P.O. Box 30093 Jetpark 1469
   State/Province: Bredell
   Country, Postal Code: 1623

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   NO

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

   Please see attached

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

   NO

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: N/A Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b)(6) Date: 8/20/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Mashambanzou Safaris

From: Mashambanzou Safaros
Grant Taylor owner
Mozambique address- Terminal de Carga aeroporto Beira
Mozambique, Tel no + 258825330796, Ph 258 3 326486
email: grant@mashambanzousafaris.com

1 March, 2018

To Whom It May Concern:

Mr. Mark Hettervig, will be hunting will be hunting leopard, buffalo, and plains game with my company in the Tete Province in North central Mozambique in a hunting concession on the northern bank of Lake Cahora Bassa from 31 August to 25 September 2018. Please ensure Mr. Hettervig is provided a visitor's visa to cover these dates for his hunting safari. He will be flying back to the USA after his safari is completed in Mozambique.

Grant Taylor

Grant Taylor
Professional Hunter

PEDIDO DE ENTRADA EM MOCAMBIQUE
REQUEST FOR ENTRY VISA TO MOZAMBIQUE

RECIBO Nº

PREENCHER COM LETRA LEGIVEL
TO BE FILLED IN LEGIBLE LETTERS

RESERVADO AOS SERVICOS:
FOR OFFICIAL USE

VISTO Nº

UMA ENTRADA
Single entry [X]

DUPLAS ENTRADAS
Double entry [ ]

MULTIPLAS ENTRADAS
Multiple entries [ ]

DATA DE EMISSAO
...../...../.....

VALIDADE
...../...../.....

APELIDO
Surname
Hettervig

NOME COMPLETO
Full name
Mark John

NOME DE SOLTEIRA
Maiden name
N/A

PAIS E LOCAL DE NASCIMENTO
Country and place of birth

DATA DE NASCIMENTO
Date of birth
(b)(6)

SEXO
Sex
M

ESTADO CIVIL
Ma
(b)(6)

NACIONALIDADE
Nationality
Caucasian

(b)(6)

DATA DE EMISSAO
Date of issue
...../...../.....

Validade
Validity
...../...../.....

NACIONALIDADE DO P.te
P.te nationality

PROFISSAO/OCUPACAO
Profession/Occupation
OWNER of Portland Mechanical
Sierra Case Parts
Northern Lights Wreath Co

CARGO QUE OCUPA
Position you hold
OWNER / Founder

INSTITUICAO, ORGANIZACAO OU EMPRESA ONDE TRABALHA
Institution, organization or firm you work
OWNER of (b)(6)

(b)(6)

ENDERECO DA RESIDENCIA PERMANENTE
Address of the permanent residence
(b)(6) Tenino WA 98589-9800

ESTEVE ALGUMA VEZ EM MOCAMBIQUE ?
Have you ever before been in Mozambique ?
SIM Yes [X] NAO No [ ]

JA FOI RESIDENTE EM MOCAMBIQUE ?
Have you ever been a resident in Mozambique ?
SIM Yes [ ] NAO No [X]

PORQUE SAIU DE MOCAMBIQUE ?
Why did you leave Mozambique ?
Hunt / tour over

DATA DE SAIDA
Date of exit ...../...../.....

INDIQUE AS INSTUICOES E EMPRESAS A QUE ESTEVE LIGADO
Mention the institutions and firms to which you were attached
Mosanmbanzou Safaris

O PREENCHIMENTO INCORRECTO OU INCOMPLETO IMPLICA RESPOSTA TARDIA, DEVOLUCAO OU INDEFERIMENTO
INCOMPLETE OR INCORRECT FILLING IN OF THIS FORM MAY RESULT IN DELAY DEVOLUTION OR REJECTION

DETALHE OS MOTIVOS DA ENTRADA EM MOCAMBIQUE Sport hunting safari
In detail give reasons for your entry in Mozambique
To hunt Leopard, crock, Hyena, Chapman's zebra

TEMPO DE ESTADA EM MOCAMBIQUE Length of stay in Mozambique	DATA DE ENTRADA Date of entry	DATA DE SAIDA Date of exit
30 days	../../..	../../..

FRONTEIRA DE ENTRADA Entry border	FRONTEIRA DE SAIDA Exit border
Beira International Airport	Beira International Airport

ENDERECO DA HOSPEDAGEM EM MOCAMBIQUE – Address of residence in Mozambique

PROVINCIA Province	DISTRITO District	CIDADE City	AVENIDA/RUA Avenue/street	CASA Nº House Nº
Sofala	Muanza	Muanza	N/A	N/A

FAMILIARES/AMIGOS RESIDENTES EM MOCAMBIQUE – Relatives, friends living in Mozambique

NOME COMPLETO Full name	NACIONALIDADE Nationality	PARENTESCO Relationship	ENDERECO Address
Grant Taylor	Zimbabwean	Safari Operator	Aeroporto da Beira
			Terminais de carga
			Beira Mozambique

RESERVADO AOS SELOS
Reserved for stamps

DATA
Date ../../..

ASSINATURA DO REQUENTE OU DA ENTIDADE SOLICITANTE
Signature of applicant or of the applying entity

ASSINATURA RECONHECIDA POR SEMELHANCA A EXISTENTE NO .....
Nº ..... **EMITIDO A** ../../.. **EM** .....

RESERVADO AOS SERVICOS For official use	DATA DE RECEPCAO
	../../..
	DATA DE ENTREGA
ASSINATURA DO FUNCIONARIO	../../..

Gracy Travel International, Inc.

706 S. Main Street
Boerne, Texas 78006
(210) 698-2611
(800) 299-8558
Fax (210) 591-7889
Email : christy@gracytravel.com
www.gracytravel.com

Mandate Letter

RE: SAP'S 520 APPLICATION

Passenger Name: Mark J. Hetterig

PASSPORT NUMBER: (b)(6)

I Mark J. Hetterig AUTHORISE GRACY TRAVEL INTERNATIONAL TO PROCESS AND APPLY FOR MY (SAP'S 520) GUN PERMIT APPLICATION ON MY BEHALF. GRACY TRAVEL REPRESENTATIVES CAN ASSIST WITH QUESTIONS OR CONCERNS REGARDING THE APPLICATION.
MY HUNTING DATES ARE FROM_____UNTIL_____

NAME OF APPLICANT: Mark J. Hetterig

(b)(6)
(Signature)

D. TYPE OF PERMIT (Indicate with an X)

1 Multiple import or export permit		2 Import permit		3 Export permit		4 In-transit permit		5 Temporary import or export permit	

E. PARTICULARS OF APPLICANT

1 **NATURAL PERSON'S DETAILS**

2 **Type of Identification** (Indicate with an X)

2.1	SA ID		Passport	

3	Identity number of natural person	(b)(6)																	
4	Passport number of natural person	(b)(6)																	
5	Surname	HETTERVIG												6 Initials	M	J	H		
7	Full names	MARK JOHN																	
8	Date of birth	(b)(6)												9 Age	(b)(6)				
10	Gender	Male	Female																
11	Residential address	(b)(6)																	
		TENINO, WA												98589	12 Postal Code	9	8	0	0
13	Postal address	(b)(6)																	
		Milwaukie, OR													14 Postal Code	9	7	2	2
15	Trade or profession	OWNER / Founder												16 If self-employed, specify					
17	Name of employer/company	(b)(6)																	
18	Business address	(b)(6)																	
		Milwaukie OR													19 Postal Code	9	7	2	2
20	Telephone number	20.1 Home	(b)(6)											20.2 Work	(b)(6)				
20.3	Cellphone number	(b)(6)												21 Fax	(b)(6)				
22	E-mail address	(b)(6)																	

23 **Marital status** (Indicate with an X)

24	Single		Married	X	Divorced		Widow		Widower	
	Other (specify)									

25 **PARTICULARS OF APPLICANT'S SPOUSE/PARTNER** (If applicable)

25.1 **Type of Identification** (Indicate with an X)

25.1.1	SA ID		Passport	

25.2	Identity number of spouse/partner																		
25.3	Passport number of spouse/partner																		
25.4	Full Name and Surname	Cheryl T. Hettervig																	

26 **JURISTIC PERSON'S DETAILS**

27	Registered company name	
28	Trading as name	
29	FAR number	
30	Postal address	

9 Validity of the transporter's permit FROM Date - - TO Date - -

10 Transport route

I. DETAILS OF FIREARMS

1

1.1 Type	1.2 Action	1.3 Calibre	1.4 Model	1.5 Make	1.6 Frame or receiver serial number	1.7 Barrel serial number
Rifle	BOLT	338 Rum	SAKO F	SAKO	984681	984681
Rifle	BOLT	280 Imp	Ackerly	Ackerly	D6631349	D6631349

2 DETAILS OF AMMUNITION

2.1

2.1.1 Type	2.1.2 Quantity
338 Rum	4 BOXES
280 Imp	4 BOXES

2.2

2.2.1 Type	2.2.2 Quantity

3 **DECLARATION BY PERSON WHO IS LAWFULLY IN POSSESSION OF THE FIREARM(S)**

I hereby declare that the above firearm(s) is/are legally in my possession and that I propose to supply it to the applicant once the necessary permit(s) has/have been obtained and that the particulars of the firearm(s) are correct and accurate.

4 **SIGNATURE OF PERSON CURRENTLY IN POSSESSION**

4.1 Mark J. Hettervig
Name of person currently in possession in block letters

4.2 Date 2018-02-04 April

4.3 Signature of person currently in possession

4.4 Place Washington

5 **DECLARATION OF APPLICANT**

I am aware that it is an offence in terms of section 120 (9)(f) of the Firearms Control Act, 2000 (Act No 60 of 2000), to make a false statement in this application.

J. **SIGNATURE OF APPLICANT** (Sign only if applicable)

1 Mark J. Hettervig
Name of applicant in block letters

2 Date 2018-02-04 April

3 Signature of applicant

4 Place Washington

K. (This section must be completed only if the applicant cannot read or write)

1 Right index fingerprint of applicant

2 Fingerprint designation 4

3 Date

Name of applicant in block letters

5 Place

6 **PARTICULARS OF POLICE OFFICIAL DEALING WITH APPLICATION**

6.1 Name of police official in block letters

6.2 Persal number of police official

6.3 Rank of police official in block letters

6.4 Signature of police official

7 **PARTICULARS OF WITNESS**

7.1 Name of witness in block letters

7.2 Persal number of witness

7.3 Rank of witness in block letters

7.4 Signature of witness

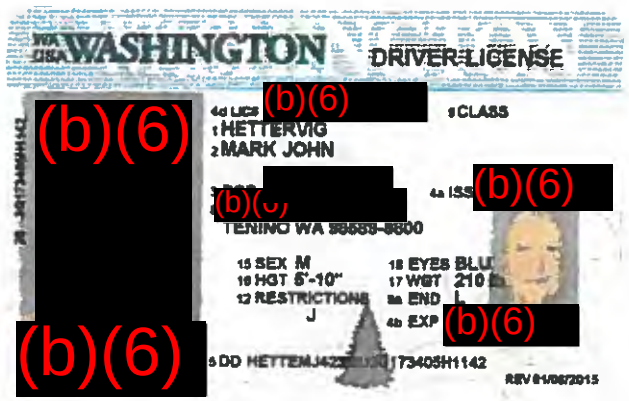
L. **PARTICULARS OF INTERPRETER**
(This section must be completed only if the applicant cannot read or write or does not understand the content of this form.)

1 Name and surname of interpreter

2 Identity/Passport number of interpreter

3 Residential address

4 Postal Code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DRIVER LICENSE
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9 CLASS
1 HETTERVIG
2 MARK JOHN
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TENINO WA
15 SEX M
16 HGT 5'-10"
12 RESTRICTIONS
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18 EYES BLU
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8a END
4b EXP
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5 DD
73405H1142
REV 01/08/2015

Mark

TSA #

(b)(6)

We the People
Of the United States,
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
UNITED STATES OF AMERICA
(b)(6)
P
USA
HETTERVIG
MARK JOHN
UNITED STATES OF AMERICA
(b)(6)
OREGON, U.S.A.
(b)(6)
(b)(6)
M
United States
Department of State
SEE PAGE 27
USA
P<USAHETTERVIG<<MARK<(b)(6)<<<<<<<<<<<<<<<<<<<<
(b)(6)

Lifetime Immunization Record
Registro de Inmunizacion

AFFIX ALERT LABEL HERE WHEN AVAILABLE

Full Name / *Nombre*: Mark Hetherwig

Birthdate / *Fecha de Na*: (b)(6)

Patient's ALERT # / *Numero de ALERT del Paciente*

Patient's Social Security # / *Numero de Seguro Social del Niño*

Parent/Guardian / *Padre/Tutor*

Comments / *Comentarios*

(b)(6)

Vaccine / *Vacuna*	Dose # / *Dosis*	Vaccine Type / *Tipo de Vacuna*	Date Given Mo/Day/Yr / *Fecha*	Provider / *Médico o Clínica*	Date Next Due / *Próxima Visita*
Influenza (annual) *Influenza (anual)*	1				
	2				
List each mo/day/yr vaccine given *Indica fecha mes/día/año para cada inyección*					
Pneumococcal PPV23	1				
	2				
Hepatitis A	1				
	2				
	3				

Other (travel, HIB) *Otras (vacunas de viaje)*	Vaccine Type / *Tipo de Vacuna*	Dose # / *Dosis*	Date Given Mo/Day/Yr / *Fecha*	Vaccine Type / *Tipo de Vacuna*	Dose # / *Dosis*	Date Given Mo/Day/Yr / *Fecha*	Vaccine Type / *Tipo de Vacuna*	Dose # / *Dosis*	Date Given Mo/Day/Yr / *Fecha*
	(b)(6)								

Oregon Adult Immunization Coalition

Oregon Partnership to Immunize Children

OREGON HEALTH DIVISION

SAVE THIS DOCUMENT. IT CAN BE USED THROUGHOUT THE USA
CONSERVE ESTE DOCUMENTO SE PUEDE USAR EN TODO LOS ESTADOS UNIDOS.

Bring this record to children's facility and school registration to complete forms. Present this record at each visit to your doctor or clinic.

Es necesario monstrar ésta tarjeta al registrarse en la escuela o guarderia. Presente ésta tarjeta en cada visita con su médico o clínica.

TB Clearance - Mantoux/PPD (Tine Not Accepted)			
Date given / *Fecha*			Provider/Clinic / *Médico o Clínica*
Date read / *Fecha Prueba Fue Leido*			
Induration (mm) / *Reacción en mm*			Phone and Fax / *Telefono y Fax*

Make sure to check that immunizations are up-to-date at every visit to your health care provider.

Verifique en cada visita con su médico que las vacunas en ésta tarjeta esten al día.

To order additional Lifetime Immunization Records please contact your County Health Department Immunization Program 53-IIR (11/00 revised)

Full Name _____ **Birthdate** _____
Nombre *Fecha de Nacimiento*

Vaccine *Vacuna*	Dose # *Dosis*	Vaccine Type *Tipo de Vacuna*	Date Given Mo/Day/Yr *Fecha*	Provider *Médico o Clínica*	Date Next Due *Próxima Visita*
DTaP, DTP, DT, Td (adult) (diphtheria, tetanus, pertussis) *Difteria, tétanos, tos ferina*	1				
	2				
	3				
	4				
	5				
Td Booster every 10 years *Td dosis de refuerzo cada 10 años*	Td Booster	mo/day/yr _____ mo/day/yr _____	mo/day/yr _____ mo/day/yr _____	mo/day/yr _____ mo/day/yr _____	mo/day/yr _____ mo/day/yr _____
Polio IPV,TOPV	1				
	2				
	3				
	4				
Chickenpox (varicella) *Varicela*	1				
	2				
	If had disease, give date. *Fecha de Enfermedad.*				
MMR (combined *combinación*) or **measles only** *sarampión sola*	1				
	2				
	1				
	2				
Hepatitis B ☐ 3 dose series ☐ 2 dose series	1				
	2				
	3				
	HBIG administered at birth? Yes No				
Hib (Haemophilus influenzae type b) *Haemophilus influenzae tipo b*	1				
	2				
	3				
	4				
Pneumococcal Conjugate PCV7	1				
	2				
	3				
	4				

If using a combined vaccine, write the product name *in all the above spaces* designated for vaccine type.

Visit our website at http://www.ohd.hr.state.or.us/ccfh/imm ***Visita nuestra pagina del web http://www.ohd.hr.state.or.us/cccfh/imm***

To request this material in an alternate format (e.g., braille), please call (503) 731-4020.
Para obtener esta tarjeta en otro medio de información (braille, audio, imprenta grande), llamar al (503)731-4020.

"Mashambanzou Safaris Ltd and J & P Associates Invoice

Date: 8/20/2018

Hunt Sold To:	Mark Hettervig, 16015 S Springwater Rd. Oregon City, OR 97045, Ph 503-806-1981 Email: mark@pmc-g.com
Professional Hunter Providing Hunt: Grant Taylor owner Mashambanzou Safaris, Mozambique address- Terminal de Carga aeroporto Beira - Mozambique, Tel no + 258825330796, email: grant@mashambanzousafaris.com	
Hunt Booked By:	Mashambanzou Safaris Ltd, Joe Demby, J & P Associates, 5550 Vargo Lane, Prince George, VA 23875 phone: 804-586-1698
Hunt Type:	18 day Leopard, crocodile, plains game hunt

Cancellation Policy & Legal: Cancellation of a Safari if done 6 months prior to the commencement date will allow the client a full refund of all payments made. However, if a cancellation is made within six months of the safari all payments may be transferred to the following year as a deposit on another future hunt based on the following years prices. If the client chooses not to forward his deposit he will be charged a 50% cancellation fee of funds paid. If a cancellation is done with in 2 months of the safari date all deposits will be lost completely. In the event full payment is not received within 30 days of the completion of the safari, interest will begin to be charged at 10 % per annum on the remaining funds owed. Any legal discrepancies will be handled according to the laws of the country the safari took place.

Indemnity Clause : Mashambanzou Safaris and Mashambanzou Safaris Ltd. will not be held responsible for any loss, damage, or accident incurred by a client while they are on Safari with the company providing the hunt. Mashambanzou Safaris will not be held responsible in the event of loss of hunting days due to lost luggage or flight delays.

Hunt Date: Hunter will be picked up at Tete Airport and transported to camp on 31 August 2018. The Hunt will start on 1 September and run for 18 days ending on 18 September 2018. Hunter will be transported back to Tete Airport on 19 September 2018 for flight out to USA.	Number of (Days) (Items)	Daily Rate	Total Cost
14 day hunt for Leopard, croc, hippo, and plains game	14	$1,200.00	$16,800.00
4 days crocodile, hyena, and plains game	4	$600.00	$2,400.00
Transportation Fee to hunting area and return to Airport		$700.00	$700.00
Gun Permit, for each gun is $250	2	n/a	$500.00
Hunting License Permit is $300	1	n/a	$300.00
Pre-baiting cost $250 per day	5	$250.00	$1,250.00

Crocodile, red duiker, l. suni, t hartebeest, with other plains game to be determined. All game fees for animals taken that are not included in package will be paid for at the end of the hunt based on trophy fee list provided below. Every attempt will be made to track and recover wounded game; however, if a wounded animal cannot be recovered, the hunter will be responsible for paying the full trophy fees for that animal at the normal rate. Wounded animals are determined by the professional hunter regardless of whether there is blood or not. Note due to nature of hippo and crocodile hunting any shot taken will be considered a hit unless video evidence proves otherwise. Any female animal shot will incur full price and will not be exportable.	Species Trophy Fee	Qty	Trophy Fee	Total
	Nile Crocodile	2	$3,250.00	$6,500.00
	Lichtenstein Hartebeest	1	$3,200.00	$3,200.00
	Hyena	3	$1,750.00	$5,250.00
	Leopard	1	$8,000.00	$8,000.00
	Chapmans Zebra	1	$3,000.00	$3,000.00
	bait costs estimated	TBD		$500.00
	Trophy fee total cost			$26,450.00

Cost of hunt- less trophy fees (Sub Total)	$21,950.00

Signatures	A deposit of ($9200) was received via check #15884 on 13 March 2018 to book the hunt. A 2nd payment to cover the remainder of the daily ($12750)which includes remaining amount of daily rates, transportation cost, gun permits, and hunting license, prebaiting daily costs rates, was received on 6 August 2018 (check # 17704). A check was received on 18 Aug for $26450 via check #17791 . These trophy fees will be placed in escrow until the hunt is completed. Any funds owed the hunter will be mailed back to him immediately at the end of the hunt via a Wells Fargo Business cashers check. Please make all checks as payment to J & P Associates and mail to 5550 Vargo Lane, Prince George, VA 23875	-$48,400.00
Date: Client:	Hunter has 26450 in escrow to be used for trophy fees	$26,450.00
Date: Outfitter:	Total Cost of Safari (TBD)	TBD

OTHER COSTS: Dipping Packing and Export Documentation is calculated at the end of the safari and will be paid to the agent handling the dipping and packing and export.

2018 Trophy Fees

Animals	Fees US$	Animals	Fees US$
Elephant	$15,000	Lion	$15,000
Buffalo (1st)	$4,500	Leopard	$8,000
Buffalo (2nd) if available	$8,000	Sable	$5,000
Nyala	$3,250	Eland	$3,000
Kudu	$3,000	Lichtenstein	$3,200

Nelson, Emma <emma_nelson@fws.gov>

Fwd: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

10 messages

Williams, Robert <robert_williams@fws.gov> Fri, Nov 2, 2018 at 4:28 AM
To: Emma Nelson <emma_nelson@fws.gov>

PRT 06713D this is for you. I have his Bontebok which is why he sent the email to me.

Bob

---------- Forwarded message ---------
From: <marcieh@nlwco.com>
Date: Thu, Nov 1, 2018 at 4:36 PM
Subject: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG
To: Williams, Robert <robert_williams@fws.gov>

Good Morning-

I would like to check the status of the import permit for Mark Hettervig for his lions. Can you let me know when he can expect to get it? Please let me know if you need any additional information to look it up for me!

From: Mark Hettervig (b)(6)
Sent: Thursday, November 1, 2018 6:17 AM
To: Jackie Hodgkinson <idea@lifeform.co.za>
Cc: marcieh@nlwco.com
Subject: Re: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Marc can would check on our citi's permit on the lions

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------

From: Jackie Hodgkinson <idea@lifeform.co.za>

Date: 11/1/18 2:38 AM (GMT-08:00)

To: Mark Hettervig (b)(6)

Cc: (b)(6)

Subject: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Dear Mr. Hettervig,

We are pleased to have this opportunity to assist you with the forwarding of your trophies hunted with Shumba Safaris. We trust that you had a very enjoyable and memorable experience!

PLEASE NOTE: as you have Lion trophies included in your order, import permits will be required from US Fish & Wildlife to enable you to import the Lion trophies into your country. We will require that you obtain this import permits nearer to completion of your order.

Please check the attached order to ensure that all the trophy items required are reflected on your order. As the issuing of export permits can take up to 60 days, we would appreciate receiving your confirmation that your order is correct at your earliest convenience to enable us to make application for the export documentation soonest.

It has come to our attention that U.S. Fish & Wildlife advised that any trophy consignments entering the U.S. with documentation that is not in the client's full names, will now be sent back to the country of export for correction.

In lieu of the above, please confirm your full legal name and address as reported to the US Social Security Administration to prevent any difficulties during the clearance of your consignment on arrival in the U.S.A.

Important General Information on the USDA/APHIS perspective.

USDA Approved Taxidermist or Tannery (Fur Dressing Company)

It is important to note that most US Taxidermy Studios or businesses contract the tanning of animal hides to a professional fur-dressing company or tannery for the purpose of rendering a product acceptable for taxidermy mounting or the manufacture of a final product.

Subsequently, your appointed US Taxidermist may direct your shipment to be expedited directly to the fur-dressing company they work with. In some instances they may also direct your shipment to be expedited directly to their studio

or premises. Most importantly, it is always advisable to ensure that the US Taxidermy that you appoint to handle the final preparation of your trophies is USDA Approved.

The above is applicable to any, (dip and pack only), ruminant trophies (antlers/horns - of hoofed animals) and especially where swine trophies (Warthog and Bush pig), is contained in the shipment. Shipments containing Primates, Rodents or Civet Cats may possibly require additional filing with the CDC and U.S. Department of Public Health.

We would kindly like to request that you provide us with the Taxidermist's address to which your consignment should be delivered as well as your Clearing Agent information..

PLEASE NOTE: Life-Form Taxidermy does not accept responsibility for hair slip or damage to skins which are only dipped and shipped, as we have no control over field preparation or tanning processes used by other companies.

TAGGING OF TROPHIES: Please note that where more than one of the same species is received at our studio, they will be reflected on your order as "A" ; "B" etc. according to size, "A" being the largest.

We can advise that dip and pack consignments, are generally ready for handover to our freight agent within two to three months from full payment, provided the Outfitters supply us with all the relevant paperwork at time of delivery of the trophies to enable us to apply for the necessary export documentation timeously.

In order for us to begin preparing your trophies, we do request full payment, which can be made by wire transfer into our Bank account (details included on page 3 attached). **Please ensure that your order number (50016) is stated on the transfer.** Kindly note that payments may be made by a cashier's cheque mailed to our above P.O. Box address, however payments received by means of a cheque may take 10-12 weeks to be cleared. We kindly request that payments be made directly into our bank account.

INSURANCE: Please note: Life-Form Taxidermy DOES NOT arrange for the insurance of your consignment whilst in transit, as the insurance will be arranged by the freight agent. Attached please find IMPORTANT information with regard to the insurance cover taken for your consignment. Should you wish to insure your consignment for a different value to the attached schedule, please advise us in writing so that the freight agent may liaise with the Under Writers in this regard and advise you accordingly. The premium amounts to 1% of the total sum insured and is payable directly to the freight agent at time of exporting.

We look forward to hearing from you and can advise that we are available for any assistance you might require.

Wishing you a lovely day.

Kindest Regards.

Life-Form Taxidermy cc Disclaimer and Confidentiality Note

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Nelson, Emma <emma_nelson@fws.gov> Mon, Nov 5, 2018 at 2:57 PM
To (b)(6)

Good morning Ms. Helton,

Thank you for your email. Because you are not indicated in Mr. Hettervig's application as a contact, I cannot divulge specific information regarding his application. However, if Mr. Hettervig would like to send me a note authorizing communication with you, I am happy to give you an update with the application.

Thank you,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296
[Quoted text hidden]

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marcieh@nlwco.com <marcieh@nlwco.com> Mon, Nov 5, 2018 at 3:54 PM
To: "Nelson, Emma" <emma_nelson@fws.gov>
Cc: Mark Hettervig (b)(6)

Hi Emma-

Certainly, Mark is on this e-mail chain and he will have no problem adding me to have communication with you about his application!

Mark, can you please give me permission to discuss your Lion application with USFW Services.

Thank You~

Marcie Helton

[redacted]

515 NW Cherry Lane, Madras OR. 97741

PH: **541-475-4601** Cell: **503-729-0844** I Fax: **541-475-4509** I **Email:** marcieh@nlwco.com

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To (b)(6) [redacted]
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

[Quoted text hidden]

Ma (b)(6) [redacted] Mon, Nov 5, 2018 at 3:59 PM
To: (b)(6) [redacted] "Nelson, Emma" <emma_nelson@fws.gov>

Yes absolutely thanks mark

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: marcieh@nlwco.com
Date: 11/5/18 12:54 PM (GMT-08:00)
To: "'Nelson, Emma'" <emma_nelson@fws.gov>
Cc: Mark Hettervig (b)(6) [redacted]
Subject: RE: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Hi Emma-

Certainly, Mark is on this e-mail chain and he will have no problem adding me to have communication with you about his application!

Mark, can you please give me permission to discuss your Lion application with USFW Services.

Thank You~

Marcie Helton

(b)(6)

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To: (b)(6)
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov> Tue, Nov 6, 2018 at 9:44 AM
To:
Cc: (b)(6)

Good morning Ms. Helton,

Thank you, Mr. Hettervig for confirming Ms. Helton as a authorized contact for your application. Mr. Hettervig's application, PRT-06713D, is currently pending. Our office is in the process of making the necessary findings on sport-hunting in Mozambique related to Mr. Hettervig's application.

Thank you,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

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8 attachments

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marcieh@nlwco.com <marcieh@nlwco.com> Tue, Nov 6, 2018 at 4:45 PM
To: "Nelson, Emma" <emma_nelson@fws.gov>, (b)(6)

Good Afternoon Emma-

Thank you for the update, can you give me a time frame on when we can expect to get his permit?

Thank You~

(b)(6)

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 6, 2018 6:45 AM
To: (b)(6)
Cc

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---

marcieh@nlwco.com (b)(6) Tue, Nov 6, 2018 at 6:03 PM
To: "Nelson, Emma" <e

Hi Again Emma-

I just wanted to clarify that the permit we are inquiring about is for Mr. Hettervig's Lions that he hunted in South Africa and not in Mozambique. Can you please confirm that we are talking about the same import permit?

Thank You~

Marcie Helton

[redacted]

515 NW Cherry Lane, Madras OR. 97741

PH: **541-475-4601** Cell: **503-729-0844** I Fax: **541-475-4509** I **Email:** marcieh@nlwco.com

---

From: marcieh@nlwco.com <marcieh@nlwco.com>
Sent: Tuesday, November 6, 2018 1:45 PM
To: 'Nelson, Emma' <emma_nelson@fws.gov>;(b)(6) [redacted]
Subject: RE: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good Afternoon Emma-

Thank you for the update, can you give me a time frame on when we can expect to get his permit?

Thank You~

Marcie Helton

[redacted]

515 NW Cherry Lane, Madras OR. 97741

PH: **541-475-4601** Cell: **503-729-0844** I Fax: **541-475-4509** I **Email:** marcieh@nlwco.com

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 6, 2018 6:45 AM
To: MarkH@pmc-g.com
Cc: marcieh@nlwco.com

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[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov> Tue, Nov 13, 2018 at 8:42 AM
To: marcieh@nlwco.com

Good morning Ms. Helton,

Thank you for your reply. The application we currently have pending for Mr. Hettervig, PRT-06713D, is for the import of three male lions from Mosahmanzou Safaris in Mozambique. If this is incorrect, please have Mr. Hettervig, or you as his representative, submit revised documentation to me via email so that the proper changes can be made. In regards to the timeline, we are currently reviewing Mozambique's conservation and management of lion populations and as such, it is difficult to provide an estimate for when these findings will be finalized.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

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3 attachments

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marcieh@nlwco.com <marcieh@nlwco.com> Fri, Dec 7, 2018 at 2:08 PM
To: "Nelson, Emma" <emma_nelson@fws.gov>

Good Morning Emma-

I apologize for the delay in getting the corrected application to you. Please see updated application. I hoping you can use the documents that were originally provided as the only change is the location of where the lions here taken was not Mozambique but South Africa. I got Mr. Hettervig's hunts mixed up on the application. Please let me know what else you need to complete the import permit process!

Thank You-

[redacted]

Marcie Helton

[redacted]

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 13, 2018 5:43 AM
To: (b)(6)
Subject: L] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you for your reply. The application we currently have pending for Mr. Hettervig, PRT-06713D, is for the import of three male lions from Mosahmanzou Safaris in Mozambique. If this is incorrect, please have Mr. Hettervig, or you as his representative, submit revised documentation to me via email so that the proper changes can be made. In regards to the timeline, we are currently reviewing Mozambique's conservation and management of lion populations and as such, it is difficult to provide an estimate for when these findings will be finalized.

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> [Quoted text hidden]
> [Quoted text hidden]

[Quoted text hidden]
[Quoted text hidden]

515 NW Cherry Lane, Madras OR. 97741

PH: 541-475-4601 Cell: 503-729-0844 I Fax: 541-475-4509 I Email: marcieh@nlwco.com

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To (b)(6)
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you for your email. Because you are not indicated in Mr. Hettervig's application as a contact, I cannot divulge specific information regarding his application. However, if Mr. Hettervig would like to send me a note authorizing communication with you, I am happy to give you an update with the application.

Thank you,

Emma

Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

---------- Forwarded message ---------
From: <marcieh@nlwco.com>
Date: Thu, Nov 1, 2018 at 4:36 PM
Subject: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG
To: Williams, Robert <robert_williams@fws.gov>

Good Morning-

I would like to check the status of the import permit for Mark Hettervig for his lions. Can you let me know when he can expect to get it? Please let me know if you need any additional information to look it up for me!

Marcie Helton

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HETTERVIG.pdf
483K

Nelson, Emma <emma_nelson@fws.gov> Tue, Dec 18, 2018 at 8:24 AM
To: marcieh@nlwco.com

Good morning Ms. Helton,

Thank you for your email. I will add this to the file and change it to South Africa instead of Mozambique. If I have any additional questions I will let you know.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

[Quoted text hidden]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hettervig	Mark	John	

(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
[redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Milwaukie	Oregon	97222	Clackamas	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other [redacted] ***50***, and I certify that the information submitted in this application for a permit is complete and accu[redacted]hat any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) [redacted] 12/7/18

Signature of a[redacted]d or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Marcie Helton (b)(6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo 3 male lions

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Shumba Safaris established in 1993 and situated in the North Eastern part of South Africa, known as the Lowveld, home to the jewel of African Game Reserves – The Kruger National Park, and South Africa's prime Big 5 destination.

b. Date wildlife was hunted:

May 7, 2018 to May 20, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Shumba Safaris outfitter is Jan Dumon

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Life Form South Africa 7 Aluminium Street, White River, South Africa, 1240

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Already submitted with original appliation

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Life Form
Address: 7 Aluminium Street, White River, South Africa 1240
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

$61,000 for 3 lions

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b)(6) Date: 12/7/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Nelson, Emma <emma_nelson@fws.gov>

[EXTERNAL] IMPORT PERMIT - LION - MR. MARK J. HETTERVIG

3 messages

Debbie Turrentine <dturrentine@sierracaseparts.com> Tue, Mar 26, 2019 at 7:19 PM
To: "emma_nelson@fws.gov" <emma_nelson@fws.gov>
Cc: Mark Hettervig <markh@nlwco.com>, "jdelacruz@coppersmith.com" <jdelacruz@coppersmith.com>

Emma,

Marcie no longer works for us.

Please add me as your contact for Mark Hettervig.

He is copied here to provide the authority for you to speak with me.

Please provide the status of the Lion Import Permit that was filed last Fall.

See email chain below for reference.

Debbie Turrentine

HR/Office Manager

Office: 503-656-7400

Sierra Case Parts

[redacted]

From: Marcie Helton (b)(6)
Sent: Tuesday, March 26, 2019 4:14 PM
To: Debbie Turrentine (b)(6)
Subject: Fw: [EXTERN CK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, December 18, 2018 5:24 AM

To: marcieh@nlwco.com
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you for your email. I will add this to the file and change it to South Africa instead of Mozambique. If I have any additional questions I will let you know.

Best,

Emma

Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

On Fri, Dec 7, 2018 at 2:10 PM <marcieh@nlwco.com> wrote:

> Good Morning Emma-
>
> I apologize for the delay in getting the corrected application to you. Please see updated application. I hoping you can use the documents that were originally provided as the only change is the location of where the lions here taken was not Mozambique but South Africa. I got Mr. Hettervig's hunts mixed up on the application. Please let me know what else you need to complete the import permit process!
>
> Thank You-
>
> [redacted]

Marcie Helton

Sierra Case Parts, LLC. I www.sierracaseparts.com; ap@sierracaseparts.com

2000 SE Hanna Harvester Drive I Milwaukie, Or. 97222

515 NW Cherry Lane, Madras OR. 97741

PH: 541-475-4601 Cell: **503-729-0844** I Fax: **541-475-4509** E-mail: mhelton@sierracaseparts.com

From: Nelson, Emma <emma_nelson@fws.gov>
Se er 13, 2018 5:43 AM
To (b)(6)
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you for your reply. The application we currently have pending for Mr. Hettervig, PRT-06713D, is for the import of three male lions from Mosahmanzou Safaris in Mozambique. If this is incorrect, please have Mr. Hettervig, or you as his representative, submit revised documentation to me via email so that the proper changes can be made. In regards to the timeline, we are currently reviewing Mozambique's conservation and management of lion populations and as such, it is difficult to provide an estimate for when these findings will be finalized.

Best,

Emma

Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

On Tue, Nov 6, 2018 at 6:04 PM <marcieh@nlwco.com> wrote:

> Hi Again Emma-
>
> I just wanted to clarify that the permit we are inquiring about is for Mr. Hettervig's Lions that he hunted in South Africa and not in Mozambique. Can you please confirm that we are talking about the same import permit?
>
> *Thank You~*
>
> *Marcie Helton*
>
> **515 NW Cherry Lane, Madras OR. 97741**
>
> **PH: 541-475-4601** Cell: **503-729-0844** I Fax: **541-475-4509** I **Email:** marcieh@nlwco.com

---

From: marcieh@nlwco.com <marcieh@nlwco.com>
Sent: Tuesday, November 6, 2018 1:45 PM
To: 'Nelson, Emma' <emma_nelson@fws.gov>; 'MarkH@pmc-g.com' <MarkH@pmc-g.com>
Subject: RE: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good Afternoon Emma-

Thank you for the update, can you give me a time frame on when we can expect to get his permit?

Thank You~

Marcie Helton

515 NW Cherry Lane, Madras OR. 97741

PH: 541-475-4601 Cell: **503-729-0844** I Fax: **541-475-4509** I **Email:** marcieh@nlwco.com

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 6, 2018 6:45 AM
To: MarkH@pmc-g.com
Cc: marcieh@nlwco.com
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you, Mr. Hettervig for confirming Ms. Helton as a authorized contact for your application. Mr. Hettervig's application, PRT-06713D, is currently pending. Our office is in the process of making the necessary findings on sport-hunting in Mozambique related to Mr. Hettervig's application.

Thank you,

Emma

Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

On Mon, Nov 5, 2018 at 4:00 PM Mark Hettervig <MarkH@pmc-g.com> wrote:

> Yes absolutely thanks mark

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------

From: marcieh@nlwco.com

Date: 11/5/18 12:54 PM (GMT-08:00)

To: "'Nelson, Emma'" <emma_nelson@fws.gov>

Cc: Mark Hettervig <MarkH@pmc-g.com>

Subject: RE: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Hi Emma-

Certainly, Mark is on this e-mail chain and he will have no problem adding me to have communication with you about his application!

Mark, can you please give me permission to discuss your Lion application with USFW Services.

Thank You~

Marcie Helton

515 NW Cherry Lane, Madras OR. 97741

PH: 541-475-4601 Cell: **503-729-0844** I Fax: **541-475-4509** I **Email:** marcieh@nlwco.com

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To: marcieh@nlwco.com
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you for your email. Because you are not indicated in Mr. Hettervig's application as a contact, I cannot divulge specific information regarding his application. However, if Mr. Hettervig would like to send me a note authorizing communication with you, I am happy to give you an update with the application.

Thank you,

Emma

Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

---------- Forwarded message ---------
From: <marcieh@nlwco.com>
Date: Thu, Nov 1, 2018 at 4:36 PM
Subject: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG
To: Williams, Robert <robert_williams@fws.gov>

Good Morning-

I would like to check the status of the import permit for Mark Hettervig for his lions. Can you let me know when he can expect to get it? Please let me know if you need any additional information to look it up for me!

Marcie Helton

Portland Mechanical Contractors, Inc. I www.pmc-g.com I Sierra Case Parts, LLC. I www.sierracaseparts.com

2000 SE Hanna Harvester Drive I Milwaukie, Or. 97222 I PH: 541-475-4601 – Cell – 503-729-0844 I Fax: 541-475-4509

E-mail for PMC mhelton@pmc-g.com E-mail for Sierra Case mhelton@sierracaseparts.com

---

From: Mark Hettervig <MarkH@pmc-g.com>
Sent: Thursday, November 1, 2018 6:17 AM
To: Jackie Hodgkinson <idea@lifeform.co.za>
Cc: marcieh@nlwco.com
Subject: Re: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Marc can would check on our citi's permit on the lions

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------

From: Jackie Hodgkinson <idea@lifeform.co.za>

Date: 11/1/18 2:38 AM (GMT-08:00)

To: Mark Hettervig <MarkH@pmc-g.com>

Cc: marcieh@nlwco.com

Subject: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Dear Mr. Hettervig,

We are pleased to have this opportunity to assist you with the forwarding of your trophies hunted with Shumba Safaris. We trust that you had a very enjoyable and memorable experience!

PLEASE NOTE: as you have Lion trophies included in your order, import permits will be required from US Fish & Wildlife to enable you to import the Lion trophies into your country. We will require that you obtain this import permits nearer to completion of your order.

Please check the attached order to ensure that all the trophy items required are reflected on your order. As the issuing of export permits can take up to 60 days, we would appreciate receiving your confirmation that your order is correct at your earliest convenience to enable us to make application for the export documentation soonest.

It has come to our attention that U.S. Fish & Wildlife advised that any trophy consignments entering the U.S. with documentation that is not in the client's full names, will now be sent back to the country of export for correction.

In lieu of the above, please confirm your full legal name and address as reported to the US Social Security Administration to prevent any difficulties during the clearance of your consignment on arrival in the U.S.A.

Important General Information on the USDA/APHIS perspective.

USDA Approved Taxidermist or Tannery (Fur Dressing Company)

It is important to note that most US Taxidermy Studios or businesses contract the tanning of animal hides to a professional fur-dressing company or tannery for the purpose of rendering a product acceptable for taxidermy mounting or the manufacture of a final product.

Subsequently, your appointed US Taxidermist may direct your shipment to be expedited directly to the fur-dressing company they work with. In some instances they may also direct your shipment to be expedited directly to their studio or premises. Most importantly, it is always advisable to ensure that the US Taxidermy that you appoint to handle the final preparation of your trophies is USDA Approved.

The above is applicable to any, (dip and pack only), ruminant trophies (antlers/horns - of hoofed animals) and especially where swine trophies (Warthog and Bush pig), is contained in the shipment. Shipments containing Primates, Rodents or Civet Cats may possibly require additional filing with the CDC and U.S. Department of Public Health.

We would kindly like to request that you provide us with the Taxidermist's address to which your consignment should be delivered as well as your Clearing Agent information..

PLEASE NOTE: Life-Form Taxidermy does not accept responsibility for hair slip or damage to skins which are only dipped and shipped, as we have no control over field preparation or tanning processes used by other companies.

TAGGING OF TROPHIES: Please note that where more than one of the same species is received at our studio, they will be reflected on your order as "A" ; "B" etc. according to size, "A" being the largest.

We can advise that dip and pack consignments, are generally ready for handover to our freight agent within two to three months from full payment, provided the Outfitters supply us with all the relevant paperwork at time of delivery of the trophies to enable us to apply for the necessary export documentation timeously.

In order for us to begin preparing your trophies, we do request full payment, which can be made by wire transfer into our Bank account (details included on page 3 attached). **Please ensure that your order number (50016) is stated on the transfer.** Kindly note that payments may be made by a cashier's cheque mailed to our above P.O. Box address, however payments received by means of a cheque may take 10-12 weeks to be cleared. We kindly request that payments be made directly into our bank account.

INSURANCE: Please note: Life-Form Taxidermy DOES NOT arrange for the insurance of your consignment whilst in transit, as the insurance will be arranged by the freight agent. Attached please find IMPORTANT information with regard to the insurance cover taken for your consignment. Should you wish to insure your consignment for a different value to the attached schedule, please advise us in writing so that the freight agent may liaise with the Under Writers in this regard and advise you accordingly. The premium amounts to 1% of the total sum insured and is payable directly to the freight agent at time of exporting.

We look forward to hearing from you and can advise that we are available for any assistance you might require.

Wishing you a lovely day.

Kindest Regards.

Life-Form Taxidermy cc Disclaimer and Confidentiality Note

This e-mail, its attachments and any rights attaching hereto are, unless the context clearly indicates otherwise, the property of Life-Form Taxidermy cc. It is confidential, private and intended for the addressee only. Should you not be the addressee and receive this e-mail by mistake, kindly notify the sender, and delete this e-mail immediately and do not disclose or use same in any manner whatsoever. Views and opinions expressed in this e-mail are those of the sender. Life-Form Taxidermy cc accepts no liability whatsoever for any loss or damages whatsoever and howsoever incurred, or suffered, resulting, or arising, from the use of this e-mail or its attachments. Life-Form Taxidermy cc does not warrant the integrity of this e-mail nor that it is free of errors, viruses, interception or interference.

Nelson, Emma <emma_nelson@fws.gov> Tue, Apr 9, 2019 at 7:06 AM
To: Debbie Turrentine <dturrentine@sierracaseparts.com>
Cc: Mark Hettervig (b)(6) , "jdelacruz@coppersmith.com" <jdelacruz@coppersmith.com>

Good morning Ms. Turrentine,

Thank you for your email. Once I get confirmation from Mr. Hettervig, I will change the contact information accordingly.

Thank you,
Emma
[Quoted text hidden]
--
Emma Nelson
Pronouns: she/her
[Quoted text hidden]

Jeremy Delacruz <jdelacruz@coppersmith.com> Tue, Apr 9, 2019 at 11:03 AM
To: "Nelson, Emma" <emma_nelson@fws.gov>, Debbie Turrentine <dturrentine@sierracaseparts.com>
Cc: Mark Hettervig <markh@nlwco.com>, Jeremy Delacruz <jdelacruz@coppersmith.com>

Thanks Emma,

Dear Mark,

Please see email below from USFWL and please respond to her confirming the change of contact.

Jeremy De La Cruz
Branch Manager
jdelacruz@coppersmith.com
Coppersmith Inc Global Logistics
434 Rozzi Place
South San Francisco, CA 94080
Ph: 650-872-1225 ext 109
Fax: 650-872-1070

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, April 9, 2019 4:06 AM
To: Debbie Turren ne
Cc: Mark He ervig; Jeremy Delacruz
Subject: Re: [EXTERNAL] IMPORT PERMIT - LION - MR. MARK J. HETTERVIG

[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov>

RE: [EXTERNAL] FW: New message from Contact Us form

4 messages

Debbie Turrentine <dturrentine@sierracaseparts.com> Tue, Apr 9, 2019 at 5:44 PM
To: Mark Hettervig (b)(6)
Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>, "emma_nelson@fws.gov" <emma_nelson@fws.gov>, Cheryl Hettervig <chettervig@sierracaseparts.com>, "jdelacruz@coppersmith.com" <jdelacruz@coppersmith.com>

Mark,

Please “reply all” to let them know that you authorize them to add me as a contact for you with US Fish & Wildlife.

And, remove Marcie.

Jeremy needs this done also, so we can complete this process.

Debbie Turrentine

HR/Office Manager

Office: 503-656-7400

Sierra Case Parts

[redacted]

From: Management Authority, FWHQ <managementauthority@fws.gov>
Sent: Friday, March 29, 2019 8:01 AM
To: Debbie Turrentine <dturrentine@sierracaseparts.com>
Subject: Fwd: [EXTERNAL] FW: New message from Contact Us form

Thank you for your inquiry.

Can you please provide the application number for Mr. Hettervig and authorization that you have permission to ask for this information on his behalf?

Best regards,

Amy Brisendine

****

Please review the U.S. Fish and Wildlife Service's Office of Law Enforcement's webpage on importing and exporting commercial wildlife shipments. Contact the Office of Law Enforcement to see if your situation applies.

Wildlife (including parts and products) imported or exported from the U.S. must be declared to the U.S. Fish and Wildlife Service. Please contact the Wildlife Inspector at the appropriate designated port to learn the requirements for your shipment.

Contact USDA-APHIS to determine their quarantine and health certificate requirements for import and export. Visit their website or call the National Import Export Services (NIES) Call Center: 301-851-3300.

Please check with the CDC for their requirements.

Contact the State and foreign country to check on their requirements.

We encourage permit applicants to review our tips and reminders for completing applications.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service

International Affairs Program

Division of Management Authority

Branch of Permits

1-800-358-2104

Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Going abroad? Be Informed. Buy Informed.

****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

---------- Forwarded message ---------
From: **Debbie Turrentine** <dturrentine@sierracaseparts.com>
Date: Thu, Mar 28, 2019 at 4:57 PM
Subject: [EXTERNAL] FW: New message from Contact Us form
To: managementauthority@fws.gov <managementauthority@fws.gov>

Email submitted from Contact Us form received: 3/26/2019 17:08:23 MT
Message ID: 5A9DA22F-0A44-069E-B2AEE4454ACB5C70

From: dturrentine@sierracaseparts.com
First Name: Mark
Last Name: Hettervig
State: OR
Country: US

Please provide status of Lion Import Permit, filed in January 2019. Permittee: Mark Hettervig

Debbie Turrentine

HR/Office Manager

Office: 503-656-7400

Sierra Case Parts

[redacted]

From: Contact2, FWHQ <contact2@fws.gov>
Sent: Wednesday, March 27, 2019 4:27 AM
To: Debbie Turrentine <dturrentine@sierracaseparts.com>
Subject: Re: New message from Contact Us form

Thank you for contacting the U.S. Fish and Wildlife Service.

C

ontact the Service's Division of Management Authority, Branch of Permits, at managementauthority@fws.gov or 1-800-358-2104 for assistance.

Regards,

Customer Service Center - Tier II
U.S. Fish and Wildlife Service

On Tue, Mar 26, 2019 at 7:08 PM <dturrentine@sierracaseparts.com> wrote:

> Email submitted from Contact Us form received: 3/26/2019 17:08:23 MT
> Message ID: 5A9DA22F-0A44-069E-B2AEE4454ACB5C70
>
> From: dturrentine@sierracaseparts.com
> First Name: Mark
> Last Name: Hettervig
> State: OR
> Country: US
>
> Please provide status of Lion Import Permit, filed in January 2019. Permittee: Mark Hettervig

---

Mark Hettervig (b)(6) Tue, Apr 9, 2019 at 6:21 PM
To: Debbie Turrentine <dturrentine@sierracaseparts.com>
Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>, "emma_nelson@fws.gov" <emma_nelson@fws.gov>, Cheryl Hettervig <chettervig@sierracaseparts.com>, "jdelacruz@coppersmith.com" <jdelacruz@coppersmith.com>

Yes please

Sent from my Verizon, Samsung Galaxy smartphone
[Quoted text hidden]

Jeremy Delacruz <jdelacruz@coppersmith.com> Wed, Apr 10, 2019 at 10:25 AM
To: Mark Hettervig <markh@nlwco.com>, Debbie Turrentine <dturrentine@sierracaseparts.com>
Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>, "emma_nelson@fws.gov" <emma_nelson@fws.gov>, Cheryl Hettervig <chettervig@sierracaseparts.com>

Dear Emma,

Please confirm you see Marks email message confirming your request. Thanks.

Jeremy De La Cruz
Branch Manager
jdelacruz@coppersmith.com
Coppersmith Inc Global Logistics
434 Rozzi Place
South San Francisco, CA 94080
Ph: 650-872-1225 ext 109
Fax: 650-872-1070

From: Mark He ervig <markh@nlwco.com>
Sent: Tuesday, April 9, 2019 3:21 PM
To: Debbie Turrenne
Cc: Management Authority, FWHQ; emma_nelson@fws.gov; Cheryl He ervig; Jeremy Delacruz
Subject: RE: [EXTERNAL] FW: New message from Contact Us form

Yes please

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: Debbie Turrentine <dturrentine@sierracaseparts.com>
Date: 4/9/19 2:44 PM (GMT-08:00)
To: Mark Hettervig <markh@nlwco.com>

Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>, emma_nelson@fws.gov, Cheryl Hettervig <chettervig@sierracaseparts.com>, jdelacruz@coppersmith.com

[Quoted text hidden]

[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov> Thu, Apr 11, 2019 at 7:41 AM
To: Jeremy Delacruz <jdelacruz@coppersmith.com>
Cc: Mark Hettervig <markh@nlwco.com>, Debbie Turrentine <dturrentine@sierracaseparts.com>, "Management Authority, FWHQ" <managementauthority@fws.gov>, "emma_nelson@fws.gov" <emma_nelson@fws.gov>, Cheryl Hettervig <chettervig@sierracaseparts.com>

Good morning Mr. De La Cruz,

Yes, I have received confirmation from Mr. Hettervig and have added the new contact information to the file.

Thank you,
Emma

[Quoted text hidden]

--
Emma Nelson
Pronouns: she/her
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 11 2018

LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
DEMASKE	MADELINE	MARIE	

(b)(6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)

(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
GREELEY	COLORADO	80634	WELD	US

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

SAME

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

S[redacted]permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

08/27/2018

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

PRO CARGO USA 16619 MORALES ROAD HOUSTON TEXAS 77032 — SELF ADDRESSED ENVELOPE ENCLOSED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

CINDI RULON —— CINDI.RULON@PROCARGOUSA COM 281-220-3176

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTHERA LEO LION

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   RIETBOKLAAGTE 642, MAGUDA, PONGOLA , 3170
   DISTRICT PAULPIETERSBURG, PROVINCE KWAZULU NATAL

   b. Date wildlife was hunted:

   May 7, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

PROFESIONAL HUNTER IS SEAN GARRETH KELLY
GARY KELLY SAFARIS 21 SPRINGSIDE ROAD HILLCREST KWASULU NATAL SOUTH AFRICA 3610

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

UNIVERSAL TROPHY SERVICES
PLOT 114 BASHEWA
PRETORIA 0056, SOUTH AFRICA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). ------PERMITS ATTACHED---------

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	UNIVRSAL TROPHY SERVICES
Address:	PLOT 114 BASHEWA
City:	PRETORIAL 0056
State/Province:	SOUTH AFRICA
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Additional information is attached------

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Additional information is attached-------

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Additional information is attached--------

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b)(6) _____ Date: 8/27/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Madeline Demaske – Lion permit additional application information:

9a) Do you have any information regarding the population status or trend data on the species hunted?

This information was provided by our outfitter: The current property forms part of the Wild Managed population of Lions in South Africa, as defined in terms of the Biodiversity Management Plan for Lion in South Africa. Furthermore, the property is contributing to the meta-population for the province of KwaZulu-Natal and subscribes to the principles for meta-population management as defined by the provincial conservation authority (Ezemvelo KwaZulu-Natal Wildlife). There are currently 18 lions on the property, of which three are available for offtake. Such offtakes will mimic natural population changes wherein old males are forced out of the pride structure. The property has had lions for the preceding 10 years and have been managed to ensure the genetic integrity of the prides on the property.

There are 18 lions on the concession. 5 Males, the rest are females & cubs. We have been advised that there are too many Lions on the concession & have been allocated 3 to take off.

b) In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community or government?

This information was provided by our outfitter: Hunting permit and licenses fees are paid to the provincial conservation authority, Ezemvelo KwaZulu-Natal Wildlife, with such funds being utilized to manage sustainable resource use in the province. The funds assist in the processing of hunting permits wherein the sustainability of each application is assessed and approved when appropriate.

The funds are used in various ways, but mainly for paying scouts for anti-poaching initiatives, the re-establishment of the species, security, upliftment of the area including fencing & roads.
The permit costs are R1000 & the concession fee is $35 000

c) Do you have information on other funding activities that are being carried out, or were carried out by the safari outfitter, professional hunter, concession holder or land owner that provide a conservation benefit to the species being hunted/species hunted?

Over $60,000 USD was given to the conservancy. This money has been ear-tagged for ranger education, community education, improvements to the property, and lion research. Currently, there are rangers controlling and protecting the reserve 24 hours a day. Much of the funds from the lion hunt will be directed into educating such rangers with the hopes to add additional rangers to the full-time patrol of the property. The remainder of the $60,000 will be directed to local communities to build schools, facilitate clean water treatment, provide jobs, food and promote health.

The safari outfitter funds the landowners through the concession fees paid by clients. These funds are used for the protection of game. Should there be no fees, there will be no protection of the game initiatives (scouts).

EZEMVELO KZN WILDLIFE
Conservation Partnerships & Ecotourism

ORIGINAL

ORDINARY PERMIT

Fee: R 1 100.00
Receipt No: 1558/2018

Permit No: OP 1482/2018
Contact: Miss S.M. Hughes

This permit is issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004; and in pursuance of the provisions of the Nature Conservation Ordinance No 15 of 1974 , Chapter 3 and the Regulations framed thereunder.

The permit is issued to:

Passport: (b)(6)

Madeline Demaske
c/o"Anton J Marais"
Rietboklaagte 642
Maguda
Pongola
3170

Residential Address
c/o"Anton J Marais"
Rietboklaagte 642
Maguda
Pongola
3170

Conservation District: Paulpietersburg
Province: KwaZulu-Natal

In the capacity of Hunting Client
To Hunt and Temporary Possess the following species of Game

on the property known as Rietboklaagte 642
Ngotshe District, Magudu Pongola

LION *(PANTHERA LEO)*
1 (One) Male

Hunting Client:
M Demaske
Passport: (b)(6)
Residential (b)(6)
Hillcrest
3610

Postal (b)(6)
Hillcrest
3610

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE
Conservation Partnerships & Ecotourism

ORIGINAL

Hunting Outfitter:
Mr G C Kelly
ID Number: 5202055003088

Residential: Beverley Farm, Dargle

Postal: C/O Garry Kelly Safaris, P.O.Box 143, Dargle, 3265

Professional Hunter:
Mr G C Kelly
ID Number: 5202055003088

Residential: Beverley Farm, Dargle

Postal: C/O Garry Kelly Safaris, P.O.Box 143, Dargle, 3265

Weapon: Rifle **Hunting Method:** Walk & stalk

TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED

1. It is valid only:
   (i) from: 01 January 2018
   to: 01 December 2018
   (ii) in the original
   (iii) if all 4 pages are signed by the permit holder named above
   (iv) to the permit holder named above
2. This permit/licence/certificate is issued subject to compliance with all other relevant legislation and does not preclude the permit holder from adherence thereto.
3. By signing the permit or licence the holder accepts, and agrees to comply with the conditions under which it is issued.
4. This permit is not transferable
5. Any unauthorised alteration to this permit shall render it invalid
6. This permit is valid only within the province where it was issued

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE™

Conservation, Partnerships & Ecotourism

ORIGINAL

7. The holder of the permit shall, at the request of a person authorised in terms of applicable legislation so to demand, forthwith produce such permit to such person.

8. This permit shall be invalid until such time that it is signed by the permit holder.

9. This permit shall be deemed invalid if it is lost or destroyed and no copy thereof shall be issued.

10. The prescribed fee payable for the issuing of this permit shall not be refunded.

11. If the holder of this permit contravenes or fails to comply with any condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

12. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

13. The issuing authority shall determine the species and restricted activities for which this permit will apply.

14. If this permit applies to hunting, the holder of this permit must: a. Have a copy of this permit authorising the hunt, on his or her person during the hunt: b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating: i) the permit number and date of issuiance of the permit ii) the species, sex and number of animals hunted, and iii) the location where the hunt took place.

15. Return the original permit to the issuing authority forthwith after expiry of the permit.

16. To be completed by the landowner after completion of the hunt: Name and signature of the landowner... Species, number and sex of the animals hunted

17. This permit/certificate is subject to the provisions of any applicable law in force during the period of validity of the permit/certificate.

18. The holder of this permit may also allow the holder of a Special Game Licence to hunt the game shown herein during the Closed Season. However if this permit applies to a specimen listed in the Threatened or Protected Regulations the person hunting the animal must also be in possession of a permit issued by Ezemvelo KZN Wildlife to enable the hunting to take place.

19. The holder of this permit may also allow the holder of a relevant Game Licence to hunt the game shown herein. However if this permit applies to a specimen listed in the Threatened or Protected Regulations the person hunting the animal must also be in possession of a permit issued by Ezemvelo KZN Wildlife to enable the hunting to take place.

20. The attached return of the hunting permit must be completed by the holder. The completed permit to be returned to the Chief Executive, E KZN Wildlife, P O Box 13053 Cascades, 3202 or emailed to permits@kznwildlife.com upon expiry. Failure to comply with this condition may jeopardise the issue of future permits.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE

Conservation, Partnerships & Ecotourism

ORIGINAL

21 This permit is issued to the client named above and does not entitle the Professional Hunter and/or the Hunting Outfitter to hunt the species listed herein with another client, either on the property stipulated on the permit, or any other, should the hunt not be successful.

22 The Permit Holder may allow a Professional Hunter or his Client to hunt the leopard. HOWEVER the Export of Trophies will not be permitted under any circumstances, and no negotiations will be entered into in this regard.

23 Should the hunt be successful the client must produce a copy of a valid CITES import permit before an export permit will be issued.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE
PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal
Tel +27 33 845 1320 / 1324, Fax +27 33 845 1747, Fax to Email 086 529 3320
Email permits@kznwildlife.com Website www.kznwildlife.com

Form 3-200-20 L

RCVD SEP 12 2018
OMB Control No 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

RCVD SEP 12 2018

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
DESTRUEL	MATHIEU	KEVIN	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
SANTA ROSA	CALIFORNIA	95401	SONOMA	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
NA

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

X 2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

COPPERSMITH INC.
434 ROZZI PLACE
SOUTH SAN FRANCISCO, CA. 94080

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

MATHIEU KEVIN DESTRUEL
707-576-3333
KEVIN@MEADOWARK.COM

JEREMY DELACRUZ
650-872-1225 EXT. 109
JDELACRUZ@COPPERSMITH.CO.

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. LION PANTHERA LEO

   b. Sex (if known). MALE.

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   NA

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   TANZANIA.
   KIZIGO GAME RESERVE E2. [MANYONI – SINGIDA].
   S. 06.78329°
   E. 034.39873°.

   b. Date wildlife was hunted:

   12. AUGUST. 2018.

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

AFRICAN BUFFALO SAFARI TRACKERS.

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

DAR ES SALAAM - TANZANIA.
AFRICAN BUFFALO SAFARI TRACKERS.
P.O.BOX 22758.
DAR ES SALAAM - TANZANIA.

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). See attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: AFRICAN BUFFALO SAFARI TRACKERS.
Address: P.O. BOX 22758.
City: DAR'ES.SALAAM.
State/Province:
Country, Postal Code: TANZANIA.

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

NA

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

NA

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

NA

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

    Applicant's signature: (b)(6) Date: 9/6/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ORIGINAL

19759

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

July 05, 2018 3:47:06 pm

MAIN PERMIT

IN.# 3151265

APP: 2010563

GAME HUNTING PERMIT

RETURN DATE: Tuesday, September 18, 2018

PERMIT NO. 2010564

Station DAR ES SALAAM Start Date August 08, 2018 End Date August 28, 2018 Package Type 21 DAYS Extra Days 0

This RESIDENT'S / VISITOR'S Permit is Granted to MATHIEW KEVIN DETRUEL of Address Passport No. (b)(6) [redacted]

Who holds Weapon (Type) RIFLE Calibre 416 Maker's No: 66557703 C.A.R No: -

Licence No: B009130 Dated 27-Jun-2018 Issued At Weapon owner & Address MATHIEUI KEVIN

and entitles him to hunt the below animals in the (Game area and blocks) KIZIGO GR E2

owned by AFRICAN BUFFALO SAFARIS TRACKERS LTD

PH GAMSHARD GAMDUST, PH CAT. LICENSE No.

Additional Blocks

Signature of Holder

Signature of Issuing Officer & Official Stamp

Idara ya Wanyamapori DAR

DIRECTOR OF WILDLIFE
05 JUL 2018
P. O. Box 1994
DAR-ES-SALAAM

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	BABOON YELLOW	1	
2	BUFFALO AFRICAN CAPE	3	
3	BUSHBUCK CHOBE	1	
4	BUSHPIG	1	
5	CARACAL	1	
6	CIVET AFRICAN	1	
7	DIKDIK KIRK'S	1	
8	DOVE	5	
9	DUCK	5	
10	DUIKER COMMON	1	
11	ELAND PATERSON'S	1	
12	FRANCOLIN	5	
13	GEESE	5	
14	GENET COMMON	1	
15	GUINEAFOWL	5	
16	HARTEBEEST LICHTENSTEIN'S	2	
17	HIPPO	1	
18	HYAENA SPOTTED	1	
19	IMPALA SOUTHERN	2	
20	JACKAL COMMON	1	
21	KLIPSPRINGER	1	
22	KUDU GREATER	1	
23	KUDU LESSER	1	
24	LEOPARD	1	
25	LION	1	
26	ORIBI COMMON	2	
27	OSTRICH	1	
28	PORCUPINE CRESTED	1	
29	RATEL (HONEY BADGER)	1	
30	REEDBUCK SOUTHERN (COMMON)	2	
31	ROAN ANTELOPE	1	
32	SABLE ANTELOPE ROOSEVELT	1	

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer
3. Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep , transfer.
5. A Professional Hunter conducting a safari must carry his /her PH Licence during the entire safari
6. A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
7. For weapons indicate the heaviest rifle in the case of big game or shortgun in the case of birds or others in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and or weight and record them in the data sheet provided immediately after an animal shot and its carcass .

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOUR
WILDLIFE DIVISION

July 05, 2018 3:47:07

PERMIT NO. 2010564

CLIENT NAME MATHIEW KEVIN DETRUEI

COMPANY AFRICAN BUFFALO SAFARIS TRACKERS ETD

PH NAME GAMSHARD GAMDUST,

PH LICENSE NO

197

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMA

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
ZEBRA BURCHELLS	ONE	K121GO EAST-02	.416	10/08/2018	18:15Pm	M	S 06.66967° E 034.49253°	268.2cm	
SABLE ANTELOPE	ONE	K121GO EAST-02	"	11/08/2018	07:10Am	M	S 06.62898° E 034.52415°		
IMPALA-SOUTHERN	ONE	K121GO EAST-02	"	12/08/2018	08:48Am	M	S.06.61897° E.034.60455°		
LION	ONE	K121GO EAST-02	"	12/08/2018	17:08Pm	M	S.06.7832° E.034.51873°	9.7FT Tip to Tail	
BRIBI COMMON	ONE	K121GO EAST-02	"	16/08/2018	11:10Am	M	S.06.66263° E.034.45317°		
BUFFALO AFRICAN CAPE	ONE	K121GO EAST-02	"	17/08/2018	17:34Pm	M	S.06.73936° E.034.40858°		
HARTEBEEST LICHTEN	ONE	K121GO EAST-02	"	18/08/2018	11:12Am	M	S.06.83376° E.034.40993°		
DIKDIK KIRKS	ONE	K121GO EAST-02	"	20/08/2018	18:12Pm	M	S.06.67046° E.034.43929°		
GUINEA FOWL	ONE	K121GO EAST-02	"	22/08/2018	08:31Am	M			
ELAND PAERSONS	ONE	K121GO EAST-02	"	23/08/2018	12:46Pm	M	S.06.79235° E.034.49179°		
WARTHOG	ONE	K121GO EAST-02	"	24/08/2018	17:22Pm	M	S.06.65472° E.034.43021°		
JACKAL COMMON	ONE	K121GO EAST-02	"	25/08/2018	17:15Pm	M	S.06.61744° E.034.61959°		
KUDU GREATER	ONE	K121GO EAST-02	"	14/08/2018	12:15Pm	M	S.06.66852° E.034.45559°		WOUNDED & LOST

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunting permit

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Permit Application #07512D

Kevin Destruel (b)(6) Tue, Sep 10, 2019 at 3:34 PM
To: "Harcum, Heather" <heather_harcum@fws.gov>

That is my correct address and have forwarded the request to my Professional Hunter and he will be responding back to you with the data you are requesting.
Thank You,
Mathieu Kevin Destruel

Sent from my iPhone
[Quoted text hidden]

Harcum, Heather <heather_harcum@fws.gov>

USFWS ESA Lion Trophy Permit Application #07512D

1 message

Harcum, Heather <heather_harcum@fws.gov> Tue, Sep 10, 2019 at 3:00 PM
To: (b)(6) jdelacruz@coppersmith.com

Good morning Mathieu,

I am reaching out in regards to your application to import an African lion trophy (*Panthera leo melanochaita*) with African Buffalo Safari Trackers from the Kizigo Game Reserve in Tanzania. This application was received on September 12, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. As such could you please respond to the following:

1. Confirm your physical address (currently we have (b)(6) Santa Rosa, CA 95401).

2. An operator report from African Buffalo Safari Trackers which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Information about the safari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anit-poaching activities and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

[EXTERNAL] Re: USFWS ESA Lion Trophy Permit Application #07512D

Gamshad Gamdust <ggamshad@yahoo.com>

Tue 1/21/2020 10:21 AM

To: Harcum, Heather L <heather_harcum@fws.gov>
Cc: Kevin Destruel (b)(6)

1 attachments (6 MB)

KEVIN MATHIEU DEUSTRAL REPORT.docx;

Subject: USFWS ESA Lion Trophy Permit Application #07512D:

Att: Heather Marcum.

Attached to this later is the Lion Hunting Report requested for our client Mr Kevin Matheiu Destruel.
Hope the report will be useful for his Cites Request.

With Best Regards,
Gamshad Gamdust
Professional Hunter
African buffalo Safari Trackers.
Tanzania.

On Tuesday, September 10, 2019, 03:30:11 PM EDT, Kevin Destruel <kevin@meadclark.com> wrote:

Could you please respond back to Fish and Game with the data they are requesting for the Lion Permit. They are finally moving on it.
Many Thanks my Friend
Kevin
Sent from my iPhone

Begin forwarded message:

From: "Harcum, Heather" <heather_harcum@fws.gov>
Date: September 10, 2019 at 12:00:54 PM PDT
To: (b)(6), <jdelacruz@coppersmith.com>
Subject: USFWS ESA Lion Trophy Permit Application #07512D

Good morning Mathieu,

I am reaching out in regards to your application to import an African lion trophy (*Panthera leo melanochaita*) with African Buffalo Safari Trackers from the Kizigo Game Reserve in Tanzania. This application was received on September 12, 2018.

We are in the process of reviewing applications for these imports and would like to receive the most updated information about the importer. As you may well be aware, the USFWS is now considering applications on a case-by-case basis, as opposed to making country-wide findings. As such could you please respond to the following:

1. Confirm your physical address (currently we have (b)(6) Santa Rosa, CA 95401).

2. An operator report from African Buffalo Safari Trackers which includes, but is not limited to-
- Population status or trend data on the lion population (countrywide and local to the game reserve/hunting block)
- Information on the fees paid (e.g., license or trophy fees), recipients of these fees, and the use of these fees
- Information about the safari outfitter, professional hunter, concession holder/land owner, and their activities to conserve the species (e.g., habitat management/improvement, anit-poaching activities and success in those efforts, efforts to address human-lion conflict, efforts to maintain prey populations, lion population monitoring, and community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Thank you and please feel free to reach out if you have any questions or concerns.

Best regards,
Heather Harcum

--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

KEVIN MATHIEU DESTRUEL

Report: LION (PANTHERA LEO MELANOCHAITA)
Prepared by:
Gamshad Gamdust
Professional Hunter.

The Lion harvested in Kizigo Game reserve-Tanzania with African Buffalo Safari Trackers. .:

1. Client: Kevin Mathieu Deustruel: (b)(6) , Santa Rosa, CA 95401.
2. All relevant fees are paid to Tanzania Government-Tanzania Wildlife Authority for the harvest of the said Lion. Receipt, Hunting Permit and Invoices are attached.

3. Company Report:

   Population of Lions: The Kizigo Game Reserve as a whole occupy a land of 4000 square kilometres of area, The Hunting Block, Kizigo Game Reserve E2 of which the Lion harvest took place is about 1200 square kilometre, on its southern part bordering with Rungwa Game Reserve. Adjacent on east-southern is bordering Ruaha National Park-There is a high dense of Lion population moving around in circle of these three areas. In Kizigo area by itself we have observing about 8 pride of about 6-10 Lion, Liones and cubs each pride, at least 5 pair of only males and about

6 single old mature lions moving around between 4 potential water springs.

Tanzania with land of total 1 million square kilometres has the largest number of lions compared to other African countries or world as a whole. 300.000 square kilometres is National parks and Game reserves hence accommodating between 14,000 to 15,000 Lions country wide.

4. African Buffalo Safari Trackers is committed doing intensive conservation on 24/7, 365 days basis in order to prevent wasteful of the resource mostly within its hunting blocks. The Moral is Conservation and Utilization. We value, protect and preserve the natural environment and of wildlife, Lions being among them. Attached to this is the value and volume of our commitment to conservation as well as local community Development.

5. Government of United Republic of Tanzania, a country of which our hunting blocks are, Beside the work, burget and plans of the Anti-poaching unit, The Government committed to utilize the fees comes from hunted trophy fees in this order:

   25 percent of the direct trophy fees goes to WWF of which is anti-poaching system to enhance and smoothen their operations whenever and wherever will be needful and other 25 percent of the remaining direct trophy fees goes to local community areas in order to help the local government to assist the need of its people within the surrounding of the specific hunting blocks so as country wide program. Attached to this see the below on the report of lion conservation in Tanzania.

ENOCK E. KATOMEARY

ORIGINAL

19759

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

July 05, 2018 3:47:06 pm

MAIN PERMIT

IN.# **3151265**

APP: **2010563**

GAME HUNTING PERMIT

RETURN DATE: Tuesday, September 18, 2018

PERMIT NO. **2010564**

Station DAR ES SALAAM **Start Date** August 08, 2018 **End Date** August 28, 2018 **Package Type** 21 DAYS **Extra Days:** 0

This RESIDENT'S / VISITOR'S Permit is Granted to MATHIEW KEVIN DETRUEI **of Address** [redacted] **Passport No.**

Who holds Weapon (Type) RIFLE **Calibre** 416 **Maker's No:** 66557703 **C.A.R No:** -

Licence No: B009130 **Dated** 27-Jun-2018 **Issued At** KIZIGO GR E2 **Weapon owner & Address** MATHIEUI KEVIN

and entitles him to hunt the below animals in the (Game area and blocks)

owned by AFRICAN BUFFALO SAFARIS TRACKERS LTD

PH GAMSHARD GAMDUST, **PH CAT.** **LICENSE No.**

Additional Blocks

Signature of Holder

Signature of Issuing Officer & Official Stamp

Kwa niaba ya Mkurugenzi
Idara ya Wanyamapori
DAR-ES-SALAAM

DIRECTOR OF WILDLIFE
05 JUL 2018
P.O. Box 1994
DAR-ES-SALAAM

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	BABOON YELLOW	1	
2	BUFFALO AFRICAN CAPE	3	
3	BUSHBUCK CHOBE	1	
4	BUSHPIG	1	
5	CARACAL	1	
6	CIVET AFRICAN	1	
7	DIKDIK KIRK'S	1	
8	DOVE	5	
9	DUCK	5	
10	DUIKER COMMON	1	
11	ELAND PATERSON'S	1	
12	FRANCOLIN	5	
13	GEESE	5	
14	GENET COMMON	1	
15	GUINEAFOWL	5	
16	HARTEBEEST LICHTEINSTEIN'S	2	
17	HIPPO	1	
18	HYAENA SPOTTED	1	
19	IMPALA SOUTHERN	2	
20	JACKAL COMMON	1	
21	KLIPSPRINGER	1	
22	KUDU GREATER	1	
23	KUDU LESSER	1	
24	LEOPARD	1	
25	LION	1	
26	ORIBI COMMON	2	
27	OSTRICH	1	
28	PORCUPINE CRESTED	1	
29	RATEL (HONEY BADGER)	1	
30	REEDBUCK SOUTHERN (COMMON)	2	
31	ROAN ANTELOPE	1	
32	SABLE ANTELOPE ROOSEVELT	1	

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer .
3. Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep , transfer.
5. A Professional Hunter conducting a safari must carry his /her PH Licence during the entire safari
6. A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
7. For weapons indicate the heaviest rifle in the case of big game or shortgun in the case of birds or others in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and or weight and record them in the data sheet provided immediately after an animal shot and its carcass .

ORIGINAL

19759

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

July 05, 2018 3:47:06 pm

MAIN PERMIT

IN.# **3151265**

APP: **2010563**

GAME HUNTING PERMIT

RETURN DATE: Tuesday, September 18, 2018

PERMIT NO. **2010564**

33	SANDGROUSE	5		
34	SERVAL CAT	1		
35	STEINBUCK	1		
36	WARTHOG	1		
37	WATERBUCK COMMON	2		
38	WILDCAT	1		
39	ZEBRA BURCHELL'S	2		

DIRECTOR OF WILDLIFE
05 JUL 2018
P.O. Box 1994
DAR-ES-SALAAM

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer .
3. Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep , transfer.
5. A Professional Hunter conducting a safari must carry his/her PH Licence during the entire safari
6. A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
7. For weapons indicate the heaviest rifle in the case of big game or shortgun in the case of birds or others in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and or weight and record them in the data sheet provided immediately after an animal shot and its carcass .

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOURI
WILDLIFE DIVISION

July 05, 2018 3:47:07 pm

PERMIT NO. 2010564

CLIENT NAME MATHIEW KEVIN DETRUEI

COMPANY AFRICAN BUFFALO SAFARIS TRACKERS LTD

PH NAME GAMSHARD GAMDUST,

PH LICENSE NO

19759

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS

DIRECTOR OF WILDLIFE
05 JUL 2018
P.O. BOX 1994
DAR-ES-SALAAM

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunting permit

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOURI
WILDLIFE DIVISION

July 05, 2018 3:47:07 pm

PERMIT NO. 2010564

CLIENT NAME MATHIEW KEVIN DETRUEI

19759

COMPANY AFRICAN BUFFALO SAFARIS TRACKERS LTD

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

PH NAME GAMSHARD GAMDUST,

PH LICENSE NO

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
ZEBRA BURCHELLS	ONE	KIZIGO EAST-02	.416	10/08/2018	15:15Pm	M	S.06.66967° E034.49253°	268.2cm	
SABLE ANTELOPE	ONE	KIZIGO EAST-02	"	11/08/2018	07:10Am	M	S.06.62898° E 034.52415°		
IMPALA-SOUTHERN	ONE	KIZIGO EAST-02	"	12/08/2018	08:48Am	M	S.06.61817° E.034.60435°		
LION	ONE	KIZIGO EAST-02	"	12/08/2018	17:10Pm	M	S.06.78329° E.034.39873°	9.7FT. Tip to Tail	
ORIBI COMMON	ONE	KIZIGO EAST-02	"	16/08/2018	11:10Am	M	S.06.66268° E.034.45317°		
BUFFALO AFRICAN CAR	ONE	KIZIGO EAST-02	"	17/08/2018	17:34Pm	M	S.06.73936° E.034.40858°		
HARTEBEEST LICHTEIN	ONE	KIZIGO EAST-02	"	18/08/2018	11:12Am	M	S.06.83376° E.034.40993°		
GUINEA FOWL	ONE	KIZIGO EAST-02	"	22/08/2018	05:31Am	M	S.06.7832° E.034.60442°		
DIKDIK COMMON	ONE	KIZIGO EAST-02	"	23/08/2018	18:42Pm	M	S.06.67044° E.034.43929°		
ELAND PATERSON'S	ONE	KIZIGO EAST-02	"	23/08/2018	12:46Pm	M	S.06.79275° E.034.49179°		
WARTHOG	ONE	KIZIGO EAST-02	"	24/08/2018	17:22Pm	M	S.06.65471° E.034.61954° 43821		
JACKAL COMMON	ONE	KIZIGO EAST-02	"	25/08/2018	17:15Pm	M	S.06.67144° E.034.61939°		
KUDU GREATER	ONE	KIZIGO EAST-02	"	14/08/2018	12:15Pm	M	S.06.66882° E.034.45559°		WOUNDED & LOST.

[redacted]
SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

Kny. MENEJA
PORI LA AKIBA
RUNGWA / KIZIGO / MUHESI
S. L. P 128
MANYONI - SINGIDA

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunting permit

[redacted]
SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

Thursday, July 5, 2018 15:47.08

WILDLIFE DIVISION

July 05, 2018 3:47:08 pm

MINISTRY OF NATURAL RESOURCES AND TOURISM

LIST OF OBSERVERS

PERMIT NO. 2010564

COMPANY AFRICAN BUFFALO SAFARIS TRACKERS LTD

GAME AREA KIZIGO GR E2 **App. #** 2010563

Observer Full Name	Nationality	Passport #	Sex	From	To	Days	Signature
KENDAL WOODWARD	UNITED STATES	568825674	FEMALE	8-Jul-18	28-Jul-18	21	

DIRECTOR OF WILDLIFE
05 JUL 2018
P. O. Box 1994
DAR-ES-SALAAM

ORIGINAL

JAMHURI YA MUUNGANO WA TANZANIA
THE UNITED REPUBLIC OF TANZANIA

TFN 527
(Rev. 11/71)

TIN:130-576-648
VRN:40-023833-X

HATI YA MADAI
GOVERNMENT BILL

C No 3151265

Kwa To: AFRICAN BUFFALO SAFARIS TRACKERS LTD

Kutoka From: TANZANIA WILDLIFE MANAGEMENT AUTHORITY
TAFORI BUILDING
KINGOLWIRA, DAR ES SALAAM ROAD
P.O BOX 2658
MOROGORO

Lipa Dr. to the DIRECTOR GENERAL - TAWA

Maelezo / Particulars	Quantity	Amount	Kiasi Amount USD
HUNTING PERMIT			
Application Number: 2010563			
Safari Package: 21 DAYS			
Client Name: MATHIEW KEVIN DETRUEI			
Hunting Block: KIZIGO GR E2			
Permit Fee	1	$1,000	$1,000
Trophy Handling Fee	1	$500	$500
Conservation Fee (Client)	1	$3,150	$3,150
Conservation Fee (Observers)	21	$100	$2,100
Conservation Fee (Extra Days)	0	$150	$0
Inter-Company Safari)	1	$0	$0
BANK DETAILS:			
BANK NAME: NATIONAL BANK OF COMMERCE (NBC) ACCOUNT NAME: TAWA COLLECTION ACCOUNT ACCOUNT NUMBER: 012105021353 BRANCH: SAMORA SWIFT CODE:12		**Total**	**$6,750.00**
		VAT (18%)	**0.00**
		Grand Total	**$6,750.00**

Kifungu cha Malipo Code to be Credited	Fungu Vote	Kifungu Sub - Vote	Sub - Head	Kijfungu Item / Job Number	Kifungu Sub-Item / Item of Cost
	69	2001			

Thursday, July 5, 2018
Tarehe
Date

MUSSA MMBAGA
Jina la Mtoaji Hati
Name of Issuing Officer

Sahihi ya Mtoaji Hati
Signature of Issuing Officer

IMELIPWA kutokana na Stakabadhi Nambari 18502442 ya Tarehe 5/7/18
PAID via Exchequer Receipt Number Dated

TAWA COLLECTION ACCOUNT P.O. Box 25295 DAR ES SALAAM

Iliyotolewa na Tawa SGA
Issued By

Sahihi / Signature

AFRICAN BUFFALO SAFARI TRACKERS

REF:ABUSAT/DAR/001/12/19

23RD December, 2019

DIRECTOR OF TAWA
TANZANIA WILDLIFE MANAGEMENT AUTHORITY
P.O.BOX 2658
MOROGORO.

Dear Sir,

RE : SUBMISSION OF INFORMATION

ABUSAT

In reference to the above heading, We are submitting to your good office the information so as to facilitate this Important exercise for the period of 2016 to 2018.
We also attach supporting documents and photos.

Your cooperation is much appreciated.

Your Sincerely,

AFRICAN BUFFALO SAFARI TRACKERS LTD.
P.O. Box 218
SHINYANGA

Hilal Soud
Managing Director.

: A : UYUMBU WMA

COMMUNITY CONTRIBUTION FOR 2016 (UYUMBU WMA)

- ABUSAT BUILT A DISPENSARY (IZENGA DISPENSARY) AT UYUMBU WORTH OF USD $12,280 (PHOTO ATTACHED)
- ABUSAT BUIL DORMITORIES AT UYUMBU SECONDARY HIGH SCHOOL WORTH $3,508 (PHOTO ATTACHED)
- ABUSAT HAS BUILT 2 MOSQUE WORTH OF $ 11,400 (PHOTO ATTACHED)
- ABUSAT DONATES $2,193 TO 2 CHURCHES AT UYUMBU.

CONTRIBUTION TO ANTIPOACHING 2016

- WE DO ALL ANTIPOACHING ACTIVITIES 24/7 IN 365 DAYS PER YEAR (INCLUDING DIESEL & FOODS) $ 15,789
- VEHICLES SERVICES AND SPARE PARTS $ 8,770
- WE PROVIDE 2 SHORTGUN TO WMA OFFICE FOR THE PURPOSE OF ENFORCEMENT PROTECTION WORTH $877

CONTRIBUTION INFRASTRUCTURE 2016

- ABUSAT HAS BUILT ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES FROM VILLAGE WMA OFFICE TO THE CAMP (STILL UNDER CONSTRUCTION) $8,770

OTHER COMMUNITY CONTRIBUTIONS 2016

- ABUSAT SENDS 2 YOUTHS FOR EDUCATION TRAINING AT PASIANSI AT WILDLIFE COLLEGE $1,800
- ABUSAT PROVIDE STATIONERIES EQUIPMENT FOR THE USE OF WMA OFFICE $350
- ABUSAT CONTRIBUTES $150 FOR MWENGE TO URAMBO DISTRICT

COMMUNITY CONTRIBUTION FOR 2017 (UYUMBU WMA)

- ABUSAT PROVIDE MATERIALS AND COSTS FOR RENOVATION OF IZENGA DISPENSARY WORTH $4,700
- ABUSAT PROVIDE DESK AND CHAIRS TO SUPPORT EDUCATION AT UYUMBU SECONDARY SCHOOL WORTH $8,400
- ABUSAT CONTRIBUTE BAJAJ WORTH $4,200 TO UYUMBU SECONDARY HIGH SCHOOL.

CONTRIBUTION TO ANTIPOACHING 2017

- WE DO ALL ANTIPOACHING ACTIVITIES 24/7 IN 365 DAYS PER YEAR (INCLUDING DIESEL & FOODS) $ 15,789
- VEHICLES SERVICES AND SPARE PARTS $ 4,200

CONTRIBUTION INFRASTRUCTURE 2017

- ABUSAT HAS BUILT A ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES FROM VILLAGE WMA OFFICE TO THE CAMP (STILL UNDER CONSTRUCTION) $8,770

OTHER COMMUNITY CONTRIBUTIONS 2017

- WE PROVIDE 5 SEWING MACHINE WORTH $2,600
- ABUSAT PROVIDE STATIONERIES EQUIPMENT FOR THE USE OF WMA OFFICE $350
- ABUSAT CONTRIBUTES $150 FOR MWENGE AT URAMBO DISTRICT

COMMUNITY CONTRIBUTION FOR 2018 (UYUMBU WMA)

- ABUSAT PROVIDE MATERIALS AND COSTS FOR RENOVATION OF IZENGA DISPENSARY WORTH $4,700
- ABUSAT PROVIDE DESK AND CHAIRS TO SUPPORT EDUCATION WORTH $4,400

CONTRIBUTION TO ANTIPOACHING 2018

- WE DO ALL ANTIPOACHING ACTIVITIES 24/7IN 365 DAYS PER YEAR (INCLUDING DIESEL & FOODS) $ 15,789
- VEHICLES SERVICES AND SPARE PARTS $ 6,578

CONTRIBUTION INFRASTRUCTURE 2018

- ABUSAT HAS BUILT A ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES FROM VILLAGE WMA OFFICE TO THE CAMP (STILL UNDER CONSTRUCTION) $8,770

OTHER COMMUNITY CONTRIBUTIONS 2018

- WE PROVIDE 2 MOTORCYCLE IN ORDER TO SUPPORT ANTIPOACHING WORTH $ 1,200
- ABUSAT PROVIDE STATIONERIES EQUIPMENT FOR THE USE OF WMA OFFICE $350
- ABUSAT CONTRIBUTES $150 FOR MWENGE AT URAMBO DISTRICT

B: MTO WA MBU -MGCA

COMMUNITY CONTRIBUTION FOR 2016 (MTO WA MBU -MGCA)

- ABUSAT DEPOSIT $650 TO ENGARUKA JUU VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $650 TO ENGARUKA CHINI VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $650 TO SELELA VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DONATED RUFFING MATERIALS WORTH $440 FOR CONSTRUCTION AT ENGARUKA CHINI VILLAGE.

CONTRIBUTION TO ANTIPOACHING 2016

- WE DO ALL ANTIPOACHING ACTIVITIES MONTHLY (INCLUDING DIESEL & FOODS) $ 4,200
- VEHICLES SERVICES AND SPARE PARTS $ 3,360

CONTRIBUTION INFRASTRUCTURE 2016

- ABUSAT HAS BUIL A ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES $865

OTHER COMMUNITY CONTRIBUTIONS 2016

- ABUSAT CONTRIBUTES $150 FOR MWENGE AT MONDULI DISTRICT
- ABUSAT CONTRIBUTES $500 FOR THE PLANTATION OF TREES

COMMUNITY CONTRIBUTION FOR 2017 (MTO WA MBU -MGCA)

- ABUSAT DEPOSIT $650 TO ENGARUKA JUU VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $650 TO ENGARUKA CHINI VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $650 TO SELELA VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT CONTRIBUTE $450 TO SELELA VILLAGE FOR DESK AND CHAIRS TO SUPPORT EDUCATION

CONTRIBUTION TO ANTIPOACHING 2017

- WE DO ALL ANTIPOACHING ACTIVITIES MONTHLY (INCLUDING DIESEL & FOODS) $ 4,200
- VEHICLES SERVICES AND SPARE PARTS $ 5,400

CONTRIBUTION INFRASTRUCTURE 2017

- ABUSAT HAS BUILT A ROAD CONSTRUCTION THAT WILL BE USED FOR COMMUNITY ACTIVITIES $865

OTHER COMMUNITY CONTRIBUTIONS 2017

- ABUSAT CONTRIBUTES $500 FOR MWENGE AT MONDULI DISTRICT

COMMUNITY CONTRIBUTION FOR 2018 (MTO WA MBU -MGCA)

- ABUSAT DEPOSIT $650 TO ENGARUKA JUU VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $650 TO ENGARUKA CHINI VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $650 TO SELELA VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT CONTRIBUTE $450 TO DISTRICT COMMISSIONER OF MONDULI DESKS SND CHAIRS TO SUPPORT EDUCATION.

CONTRIBUTION TO ANTIPOACHING 2018

- WE DO ALL ANTIPOACHING ACTIVITIES (INCLUDING DIESEL & FOODS) $ 4,560
- VEHICLES SERVICES AND SPARE PARTS $ 5,412

CONTRIBUTION INFRASTRUCTURE 2018

- ABUSAT HAS BUILT A ROAD CONSTRUCTION THAT WILL BE USED FOR COMMUNITY ACTIVITIES $877

OTHER COMMUNITY CONTRIBUTIONS 2018

- ABUSAT CONTRIBUTES $500 FOR MWENGE AT MONDULI DISTRICT

C: KIZIGO E2

COMMUNITY CONTRIBUTION FOR 2016 (KIZIGO E2)

- ABUSAT DEPOSIT $750 TO SIMBANGURU VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $750 TO NKONKO /RUNGWA GAME RESERVE/KIZIGO TO SUPPORT GAME POSTS AT NKONKO.

CONTRIBUTION TO ANTIPOACHING 2016

- WE DO ALL ANTIPOACHING ACTIVITIES MONTHLY (INCLUDING DIESEL & FOODS) $ 4,560
- VEHICLES SERVICES AND SPARE PARTS $ 8,400

CONTRIBUTION INFRASTRUCTURE 2016

- ABUSAT HAS BUIL A ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES $650

OTHER COMMUNITY CONTRIBUTIONS 2016

-

COMMUNITY CONTRIBUTION FOR 2017 (KIZIGO E2)

- ABUSAT DEPOSIT $750 TO SIMBANGURU VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $750 TO NKONKO CHINI VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT CONTRIBUTE $500 TO REPAIR GRADER MACHINE OF RUNGWA/KIZIGO GAME RESERVE.

CONTRIBUTION TO ANTIPOACHING 2017

- WE DO ALL ANTIPOACHING ACTIVITIES MONTHLY(INCLUDING DIESEL & FOODS) $ 8,400
- VEHICLES SERVICES AND SPARE PARTS $ 7,800

-

CONTRIBUTION INFRASTRUCTURE 2017

- ABUSAT HAS BUIL A ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES $870

OTHER COMMUNITY CONTRIBUTIONS 2017

- .....

COMMUNITY CONTRIBUTION FOR 2018 (KIZIGO E2)

- ABUSAT DEPOSIT $750 TO SIMBANGURU VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- ABUSAT DEPOSIT $750 TO NKONKO CHINI VILLAGE TO SUPPORT COMMUNITY DEVELOPMENT
- WE DONATED OUR RADIO TOWER AND 5 PLASTIC WATER TANKS SITUATED AT CHIKUYU HILLS WORTH $15,600 TO RUNGWA/KIZIGO GAME RESERVE.

CONTRIBUTION TO ANTIPOACHING 2018

- WE DO ALL ANTIPOACHING ACTIVITIES (INCLUDING DIESEL & FOODS) $ 9,600
- VEHICLES SERVICES AND SPARE PARTS $ 7,800
-

CONTRIBUTION INFRASTRUCTURE 2018

- ABUSAT HAS BUIL A ROAD THAT WILL BE USED FOR COMMUNITY ACTIVITIES $870

OTHER COMMUNITY CONTRIBUTIONS 2017

- .....

/N	HUNTING BLOCK	HUNTING COMPANY	YEAR	COMMUNITY CONTRIBUTION (USD)	ANTI POACHING (USD)	INFRASTRUCTURE (USD)	OTHER COMMUNITY CONTRIBUTION
	UYUMBU (WMA)	ABUSAT	2016	$ 29,381	$ 25,436	$ 8,770	$ 2,300
	UYUMBU (WMA)	ABUSAT	2017	$ 17,300	$ 19,989	$ 8,770	$ 3,100
	UYUMBU (WMA)	ABUSAT	2018	$ 9,100	$ 22,367	$ 8,770	$ 1,700
	MTO WA MBU	ABUSAT	2016	$ 2,390	$ 7,560	$ 865	$ 650
	MTO WA MBU	ABUSAT	2017	$ 2,400	$ 9,600	$ 865	$ 500
	MTO WA MBU	ABUSAT	2018	$ 2,400	$ 9,972	$ 877	$ 500
	KIZIGO E2	ABUSAT	2016	$ 1,500	$ 12,960	$ 650	
	KIZIGO E2	ABUSAT	2017	$ 2,000	$ 16,200	$ 870	
	KIZIGO E2	ABUSAT	2018	$ 17,100	$ 17,400	$ 870	

DONATED BY
ABUSAT
UYUMBU HIGH SCHOOL

ELIMU KWA MAENDELEO

Sustainability of Lion Trophy Hunting in Tanzania

Introduction

Successful conservation of large and dangerous animals, such as lions, depends primarily on the size of the available habitat. In this respect Tanzania is a model to others, with more than a quarter of their land set aside for wildlife conservation and hosting the world's largest lion population. Accordingly, Tanzania has an important contribution and responsibility for the conservation of this species.

Lions are an iconic species and this focuses public and political attention on their conservation (Macdonald et al. 2016). As a

consequence, conclusions about the best management practice are often influenced by moral and ethical considerations. On such a divisive issue, even the best available science seems to be unable to produce unambiguous results. Hence, sometimes it is necessary to make recommendations and decisions in a field of contradictions.

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Objectives

This report aims to provide a comprehensive summary of the facts necessary for a SRG decision about the sustainability of lion trophy hunting in Tanzania. It takes into account the stricter rules for trade in hunting trophies adopted at CoP17 (Resolution Conf. 17.9).

With the reports of UNEP-WCMC (2016), TAWIRI (2016), and Macdonald (2016), three excellent summaries of the implications between lion trophy hunting and conservation became available and it was not the goal of this report to replicate their content. Instead, we focus on combining the data provided by these three studies with conclusions drawn on the basis of our firsthand experience during the field mission, the information gathered during long discussions with those who actually work on the ground for the conservation and management of the Tanzanian lion population, and selected literature which addresses recent concerns about the conservation of this species.

Information Base

Compared with most other threatened species, the available knowledge about lions is extensive and comprises several hundred peer reviewed publications and reports. However, in the knowledge that the range of this species extends over the major part of Africa, it is also important to take into account the regional differences in habitat, human-wildlife conflicts, conservation policy, wildlife management, and population structure that exist.

During the course of the SRG field mission an extensive amount of information has been gathered. Together with the published literature (especially TAWIRI Wildlife Division and TAWA 2016), this provides the basis for the following evaluation.

It has not been possible to personally verify all the unpublished data provided by Tanzanian authorities during the course of the SRG field mission. However, during detailed discussions with their national experts, the presented facts held up to scrutiny and did not reveal inconsistencies. This allowed greater confidence in the accuracy of the available information and the conclusions based on them.

Monitoring

Approaches to estimate the size of lion populations are usually based on spoor counts (Davidson and Ellitot n.d.) and call-up surveys (= lion collapse technique). Both methods require considerable extrapolation and are susceptible to bias due to properties of the landscape (Funston et al. 2010). Due to the usually high coefficient of variation (e.g. Kissui 2009) for data from distance-based spoor counts of lions, abrupt declines are probably not discernible below 20% and only above 50% it

is likely to detect them (Durant et al. 2011). Even less reliable are estimates of the lion population size based on the prey-biomass regression (Kiffner et al. 2009). For elusive species, such as lions, the effort of a survey often influences the assessment of the number of individuals inhabiting an area.

Only in very few cases, long term observations allow individual counts and more accurate assessments of the population size. Recognition of individuals is more difficult in lions than in large carnivores with a complex pattern and requires the utilization of less obvious individual differences, such as whisker-spot patterns (Pennycuick and Rudnai 1970; Anderson et al. 2010). Nevertheless, a combination of strategically placed camera traps and random encounter models (REMs) can provide reliable data (Cusack et al. 2015). Detailed knowledge about lion populations mainly originate from national parks (e.g. Serengeti NP) where no hunting is allowed. Inferences about lion presence and abundance outside of protected areas are deduced mainly from an analysis of human-wildlife conflicts (Ikanda and Packer 2006). Missing calibrations between different surveillances methods often make studies incomparable and prevent an accurate calculation of population trends (Brink et al. 2013).

In average, each year since 2005 one local lion population has been surveyed in Tanzania (TAWIRI Wildlife Division and TAWA 2016). This is probably sufficient to obtain an overview of the national lion population. By taking the huge number of wildlife protection areas and the occurrence of lion populations on unprotected land into consideration, it will never be possible to conduct frequent surveys of all lion populations and deduce detailed trend analyses. Currently, there are six long-term monitoring projects with individual recognition of the specimens and in Selous observations on 7 - 9 prides reach back 40 years. However, some important lion strongholds (e.g. Ruaha-Rungwa) are not included in this program. Updates about the overall population size and trends are not provided as frequently as it would be possible due to the availability of new data. Tanzania seems to be aware that solid population data are a prerequisite for sustainable use of lions and willing to further invest in surveys.

Distribution and Habitat Protection

According to the area dedicated to the protection of wildlife, Tanzania is one of the world's leading countries in nature conservation (Brockington 2008) and lion clearly benefits from this policy. Of 516.900 km2 of permanent lion presence range in Tanzania, 57.838 km2 (11,4 %) lie within National Parks and 304.400 km2 (61,0 %) are designated as hunting areas (Mésochina et al. 2010). Ikanda and Packer (2006) estimate 81 % (13.600) of the lion population live in areas protected by National Parks (17,4 %), hunting areas (46,0 %), and areas such as forest reserves (17,6 %).

Figure 1: Protected areas in Tanzania from TAWIRI (2016)

Figure 2: Distribution of the Tanzanian lion population from Mesochina et al. (2010)

5

Sustainability of Lion Trophy Hunting in Tanzania

Population Size

The estimate for the lion population of Tanzania presented by TAWIRI (2016) is based on Ikanda and Packer (2006) and Mésochina et al. (2010) and accounts for 17.564 (12.208 – 19.320) and 16.800 respectively. Both reports break down the population estimates to the level of regions,

ecosystems, or protected areas. Information obtained by surveys since 2010 (e.g. Laizer 2014; Crosmary et al. 2016) is summarized in Table 1 of TAWIRI Wildlife Division and TAWA (2016) but did not lead to an update the total population size. Macdonald (2016) cites Dickman (in prep.) with an estimate of 9.900. This study is currently unpublished

and no information about the methodology is available. These estimates differ considerably and indicate a decline but they also demonstrate the importance of Tanzania for the global conservation of this species.

In general, lion density is highest in national parks (e.g. 22/100 km2 in Ngorongoro) and declining with the protection status of the area. In comparison, the lion density is only 5,4/100 km2 in Selous (Crosmary et al. 2016), where elephant poaching might have enhanced the food supply a few years ago. However, it should be considered that for lions habitat preference and habitat capacity can vary considerably according to the abundance of prey and availability of water (Spong 2002; Hayward et al. 2007).

6

Figure 3: Range and population size for lions in Tanzania after Ikanda & Packer (2006) and Mesochina et al. (2010)

Population Trends

Poorly regulated hunting on lions presumably was a major cause of population decline in previous decades (IUCN 2014). The only attempt to actually calculate populations trends for Tanzanian lions predicts a high chance for a decline of the East African lion metapopulational (Bauer et al. 2015a). However, whilst this publication presents a valuable compilation of data several problems with the interpretation of the data exist which affects their assessment of trophy hunting in Tanzania:

- ·The use of unweighted means to summarize population trends emphasizes changes in small populations. This is best explained by an example: Population A declines from 10 to 5 specimens = -5 specimens and -50% Population B increases from 500 to 550 specimens = +50 Specimens and +10% Unweighted means would result in an average population decline of 20%, even though the total population has increased by 45 specimens. There are arguments pro and against such a statistics and if they are used it is important to beware biased conclusions.

- ·The extrapolation of trends beyond the information-content of the available data has led to an exaggeration of the threat for a decline. Depending on the applied method, every population survey will report a certain degree of uncertainty about the estimated number of specimens. Hence, even for a perfect stable population at the maximum of the habitat capacity, the survey will indicate that the population could be smaller or larger than the estimated mean. In figure 2, 3, and 4 of Bauer et al. (2015b), for populations with a $\lambda \approx 1$ the grey area represents the likelihood of a decline and the white area represents an equal likelihood for an increase. However, the calculation of the cumulative probabilities only focuses on the possible decline and extrapolates it for three generations. This can lead to predictions of considerable probabilities for population declines for most

likely stable populations and conclusions that are far away from reality. Furthermore, these considerations include no positive effects that a previous decline might have on the population growth by increasing availability of preferred habitats and food and reducing intraspecific conflicts.

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Sustainability of Lion Trophy Hunting in Tanzania

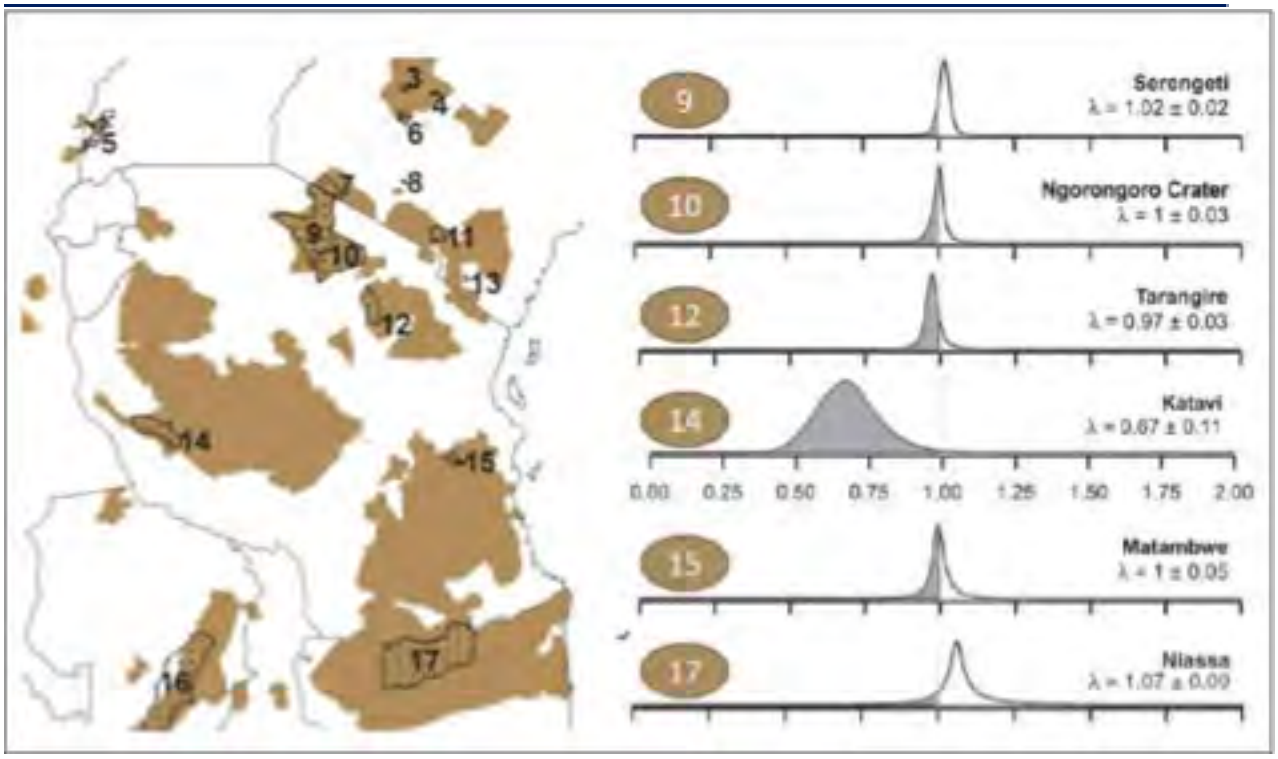

Figure 4: Trends for Tanzanian lion populations from Bauer et al. (2015) (modified)

Much attention has been focused on the decline of lions in Katavi. The local decline to the brink of extinction reported by Bauer et al. (2015a, 2016) after Caro (2011) even the imprecision of the times series and survey methodology was acknowledged (Bauer et al. 2015b) has been contradicted by Kiffner et al. (2009), Riggio et al. (2016), and Tim

Caro himself (DeMarco 2015). A possible cause might be a previous decline in large ungulates (Caro 2008) and consecutive lack of prey or unregulated hunting on lions. According to current knowledge, a

severe decline has happened but a recent case of predation on humans, tourist photographs of a reproducing pride and hunting success in adjacent areas provided evidence that the lion population of Katavi is not extinct. Such cases are a test for the quality of Tanzania's conservation management and this point has been thoroughly discussed during the SRG Field Mission. In recognition of the necessity to carefully survey the national populations, the Tanzanian Minister for Natural Resources and Tourism ordered to conduct a nationwide survey of lions and leopards and especially the situation in Katavi. Several steps have already taken place, including holding a planning workshop, successfully soliciting donor funding, and drafting a detailed project description (Ikanda et al. 2016). The start is planned for May-June 2017, after the rain season.

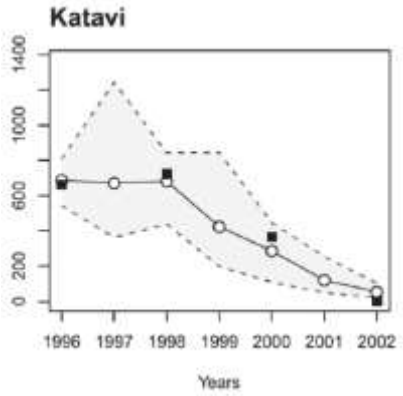

Figure 5: Population trend for lions in Katavi after Bauer et al. (2015a)

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Sustainability of Lion Trophy Hunting in Tanzania

In summary, of the six lion populations of Tanzania included in the study of Bauer et al. (2015a) the available information does provide an indication for a decline in Katavi and Tarangire, a stable development in Ngorongoro and Matambwe and an increase in Serengeti and Niassa. These developments have not been evaluated in relationship to the habitat capacity and are therefore difficult to interpret. For the

Tarangire National Park, a thorough survey has recently demonstrated that the population is not in immediate danger more conservation efforts are needed to stabilize or revert the trend (Laizer 2014).

For the Selous Game Reserve, a recent survey revealed that lion densities have remained stable and even increased in some sectors since 2009 (Crosmary et al. 2016). This contradicts concerns about the sustainability of trophy hunting in the reserve, previously expressed by (Packer et al. 2011).

It has to be assumed that human wildlife conflicts will increasingly cause population declines, especially in small sanctuaries and unprotected areas with a high density of pastoral cattle. For example, the lion population within Selous Game Reserve remains stable at a level of 4000 specimens whereas it decreased from 3600 to 1000 in the surrounding area.

Political Commitment

The investment in scientific research about wildlife conservation, the establishment of TAWA, and the engagement of high ranking officials during the SRG field mission convincingly demonstrate that sustainable wildlife conservation management has a high priority in Tanzania. A number of recent reforms of the wildlife regulations substantiate the political commitment of Tanzania to adopt best practice models and contribute to their improvement. Nevertheless, past has shown that illegal hunting fluctuates in synchrony with governmental priorities and continuity of the efforts and investments in conservation will remain a crucial factor.

If the revenues generated by the wildlife sector drop significantly, other forms of land use (e.g. mining) might become more attractive and human-wildlife conflicts can lead to considerable political pressure. Under such circumstances, the current nature conservation friendly political course might become a major burden before elections.

Legislation

It is beyond the capabilities of this field mission to explore all details of the respective legislations. Having said this, it is still possible to report that every aspect of hunting and conservation seems to be sufficiently covered by a legislation which meets the requirements of a modern constitutional state and is in accordance with international best practice. Details about specific aspects of the legislation are provided in the respective sections about the hunting management and human-wildlife conflicts. In both respects Tanzania has made considerable progress over the past decade.

The major parts of the Tanzanian wildlife legislation are:

- ·Wildlife Conservation Act No.5 of 2009
- ·Wildlife Conservation (Tourist Hunting) Regulations of 2010 & 2015
- ·Tanzania National Parks Act (CAP 284 R.E. 2002)
- ·Ngorongoro Conservation Area Act (CAP 282 R.E. 2002)
- ·Wildlife Conservation (CITES Implementation) Regulations of 2005 (currently under review) For the scope of this report it might be noteworthy, that all game is owned by the state and currently no resident hunting on lions is allowed. From the point of conservation, the transfer of ownership rights for a lot of land after 12 years of irregular occupation has the potential to downsize sanctuaries piece by piece. Shooting a lion is only allowed during the hours of darkness to ease tracking of wounded specimens.

Conservation

In Tanzania, several factors are responsible for the (unnatural) death of lions and have the potential to contribute to the

decline of this species.

The coexistence of a large and dangerous predator with humans usually fails as soon as a marginal human population density is exceeded (Bauer et al. 2016). In Tanzania, traditional cattle faming culture and rapid population growth exacerbate this conflict and results in a high number of retaliation killings.

Transfer of diseases from

domestic animals is another cause of death for lions and pathogens such as anthrax or rabies can cause local declines. The

abundance of outbreaks increases with the proximity human land use and inbreeding (Kissui and Packer 2004).

Poaching lions for material gain occurs at least in western Tanzania (Borgerhoff Mulder et al. 2009) but is relatively rare nationwide. Currently, the international marketing of lion bones seems to be no serious problem in Tanzania.

Separating the living space of lions and humans as much as possible is the most effective way to reduce human-wildlife conflicts and this can only be accomplished is by extensive dedication of land to wildlife conservation or fences which are a conservation problem of their own (Creel et al. 2013; Packer et al. 2013a,b).

Similarly to the loss of habitat, lack of prey does not result in countable deaths and therefore its effects are difficult to assess. The reproductive success and survival of lions is positively and the number of attacks on humans negatively correlated with prey availability (Haas et al. 2005; Packer et al. 2005) and if hunting on ungulates for trophies or bush meet is poorly regulated the lion population will inexorably decrease.

Under these circumstances, the only form of sustainable land use which can conserve the lion habitats is tourism. Where the landscape and accompanying fauna is not attractive enough and

Figure 6: Potential reasons for an increased morality and a decline of the size or growth of the lion population in Tanzania

the necessary infrastructure for photo tourism is not available, the only remaining option to generate income from lion habitats is hunting. Essentially everyone we spoke to in Tanzania, which included representatives of all main stakeholders (even those that were critical of the governments past efforts to conserve the species), agreed that trophy hunting has a clear conservation benefit for lions.

Hunting is a selection factor and has the potential to influence the social and genetic structure of a lion population. Traces of previous decades of unsustainable hunting are probably still responsible for differences in the population density and age structure between national parks and less protected areas. In contrast, current offtake rates are most likely compatible with an increase of lion density and higher representation of older cohorts even this might be prevented by other source of mortality. In order to ensure sustainability, it is necessary to further reduce the

effective harvest for males under 6 years of age and we had the impression that Tanzania is working towards this goal.

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Sustainability of Lion Trophy Hunting in Tanzania

Management

With a mandate from the president, the Director of Wildlife is the supreme authority for all matters concerning wildlife. Recently, a new government agency, TAWA, has been founded and entrusted with the management of wildlife outside national parks and Ngorongoro Conservation Area . This should ensure that all income generated from hunting is invested in the management and protection of wildlife. However, TAWA also has the agenda to develop tourism and under this mandate the income from sustainable wildlife management can still be diverted into projects that do not benefit conservation or even counteract this objective.

Figure 7: Fees and revenue sharing from trophy hunting in Tanzania after TAWIRI (2016) and information received during the field mission.

The Tanzania Wildlife Protection Fund (TWPF) is replenished solely by a share of the revenues from the hunting sector collected for the block fees, issuing of hunting permits (Wildlife Subsector Statistical Bulletin 2013) and observer fees for every person accompanying a hunter (Anonymus 2013). All expenses for the staff and infrastructure of the rangers

under the administration of TAWA have to be met from these incomes. Hence, the quality of the protection and all anti-poaching activities for a large part of the lion range directly depend on the income generated by hunting. This income dropped by about 30% following the import bans for lion and elephant trophies enacted by the EU and the USA.

During our field mission several officials of the wildlife management convincingly described how hunting on lion is managed in Tanzania.

This includes the implementation of all broadly accepted recommendations (Packer et al. 2011; Lindsey et al. 2013). The core element is the allocation of quotas to hunting lots according to the regional lion density, previous hunts, and the mortality from other causes (e.g. human-wildlife conflicts). More information on the work of the Tanzanian wildlife management authority is provided in the following sections wherein quota and sex and age restrictions are discussed.

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Sustainability of Lion Trophy Hunting in Tanzania

Tanzania has also published a very elaborate “National Strategy to Combat Poaching and Illegal Wildlife Trade” (Ministry of Natural Resources and Tourism 2014).

Quota

Fertility and survivability of the cubs varies for lions according to availability of prey, habitat protection, demography, landscape and accessibility of water (Kissui et al. 2010). This causes regional differences in the reproductive output of populations. Therefore,

calculating harvesting quota according to the population size, reproductive output and other sources of mortality would be the ideal solution. Even if all available information about the local situation is used to adapt the quota, this requires a very precautionary approach and surveillance of the population development (Creel et al. 2016). However, the required data are usually not available on for lions and therefore hunting quotas are normally based on the size of the habitat and modified according to the available information.

Figure 8: Utilization of lion trophy hunting quota in Tanzania from TAWIRI (2016)

For Tanzania a quota of 0.5/1,000 km2 (with the exception of Selous where 1.0/1,000 km2 is deemed as sustainable) has been proposed (Packer et al. 2011). In 2010 the offtake of lions in Tanzania was reduced by 60% and is now following the above recommendations without indications of negative consequences for the population.

Hunting season	Harvest of lion hunting trophies		
	Number	% of lion population	% of adult male population*
2007	146	0.87	2.17
2008	165	0.98	2.46
2009	132	0.79	1.96
2010	101	0.6	1.5
2011	85	0.51	1.26
2012	50	0.3	0.74
2013	54	0.32	0.8
2014	44	0.26	0.65
2015	39	0.23	0.6

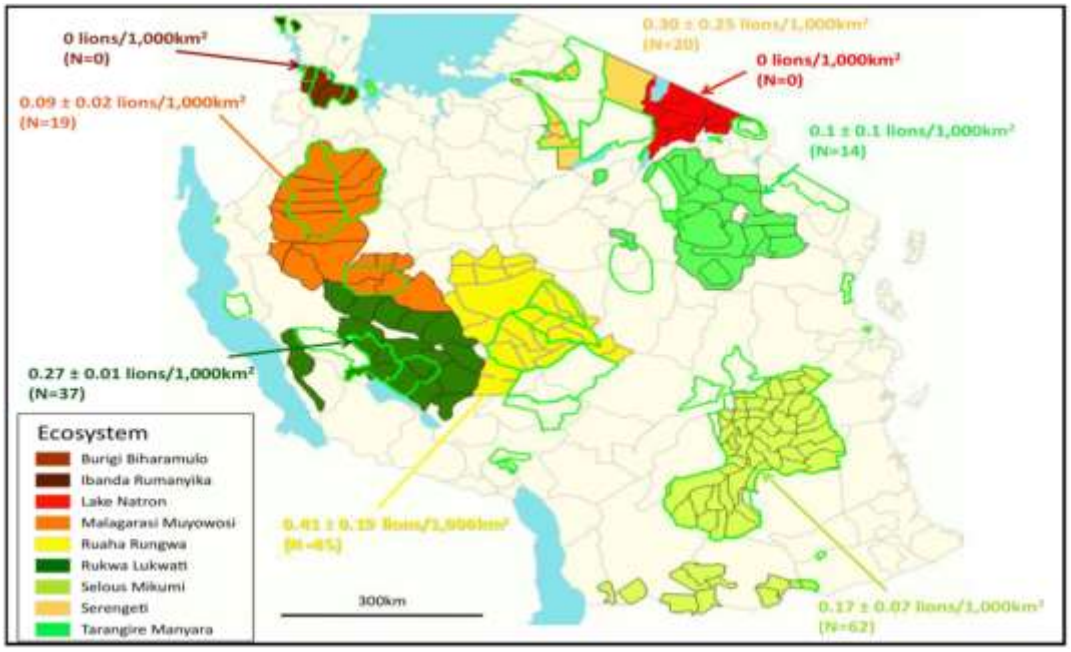
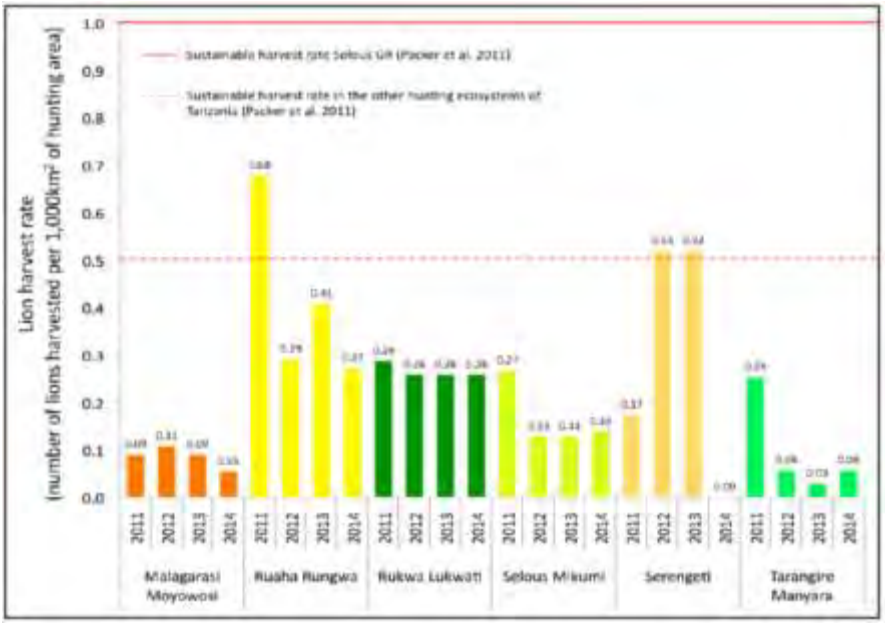


Figure 9: Regional harvest rates for lions since 2011 from TAWIRI (2016)

The small-scale allocation of hunting quotas, as it is practiced by Tanzania, provides for an equal distribution of the harvesting. However, the huge workload involved prevents a detailed assessment of every hunting block at short intervals.

Since 2012, the actual harvesting has fallen far below the allowed quota, either because of not locating an appropriate specimen in the presence of a tourist hunter or because of a failure to attract customers to a specific hunting block.

Figure 10: Average harvest rates in the main ecosystem of lion range in Tanzania between 2011 and 2014 from TAWIRI (2016)



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Sustainability of Lion Trophy Hunting in Tanzania

Sex and Age Restrictions

Age and sex restrictions are strongly recommended for sustainable trophy hunting on lions (Packer et al. 2006, 2009) and were introduced by Tanzania in 2010 under the Tourist Hunting Regulations of 2010. In sections 24(5)(a) and 24(6) of these Regulations (now superseded by section 27 (1) of the Tourist Hunting Regulations of 2015) hunting of females is prohibited, as is the killing of males below 6 years of age. Any professional hunter who guides a client to hunt a lion in contravention of these regulations is considered to have committed an offence and liable for penalties. Trophies assessed to be under 4 years-old are not allowed to be exported and incur a penalty which may include revocation of the professional hunters' license; lions in the 4 - 5 year category are allowed to be exported but still incur financial penalties.

Whereas the sex restriction is broadly accepted, the age criteria probably are not uniformly advantageous in every population. Protection of males until they have completed at least one breeding cycle is essential to prevent a depletion of the gene pool but infanticide

might only be important in areas with high migration (e.g. Serengeti) and less relatedness among neighboring prides (Spong et al. 2002). Local selection and adaptation is poorly understood but probably rather pronounced according to the differences in the size of manes between the lions of Selous and Maasai Mara. Accordingly, the most easily recognizable age-classes might differ regionally and have to be adapted to ease compliance with hunting restrictions (Miller et al. 2016).

However, the frequent disruption of the social structure might have other consequences e.g. the practice and success of social hunting strategies which in turn influence the survival of offspring.

Another reason for an age restriction is to ensure a stable sex ratio. According to information we received during the field mission, hunting does shift the ratio from 1:2 to 1:3 and that should have no serious consequences on the reproduction of the population. A severe deviation could, however, reduce the formation of groups and survival of young males.

An important argument for the lower age restrictions in Tanzania is the assertion that lions usually do not reach an age above 7 years in Selous because they mainly hunt buffalos which entails a high risk for serious injury. No scientific data are available to test this theory besides the difficulty to track down a high number of really old lions for hunting. However, males expelled from their pride have a low life expectancy and it is probably difficult to locate them for hunting before they die a natural death.

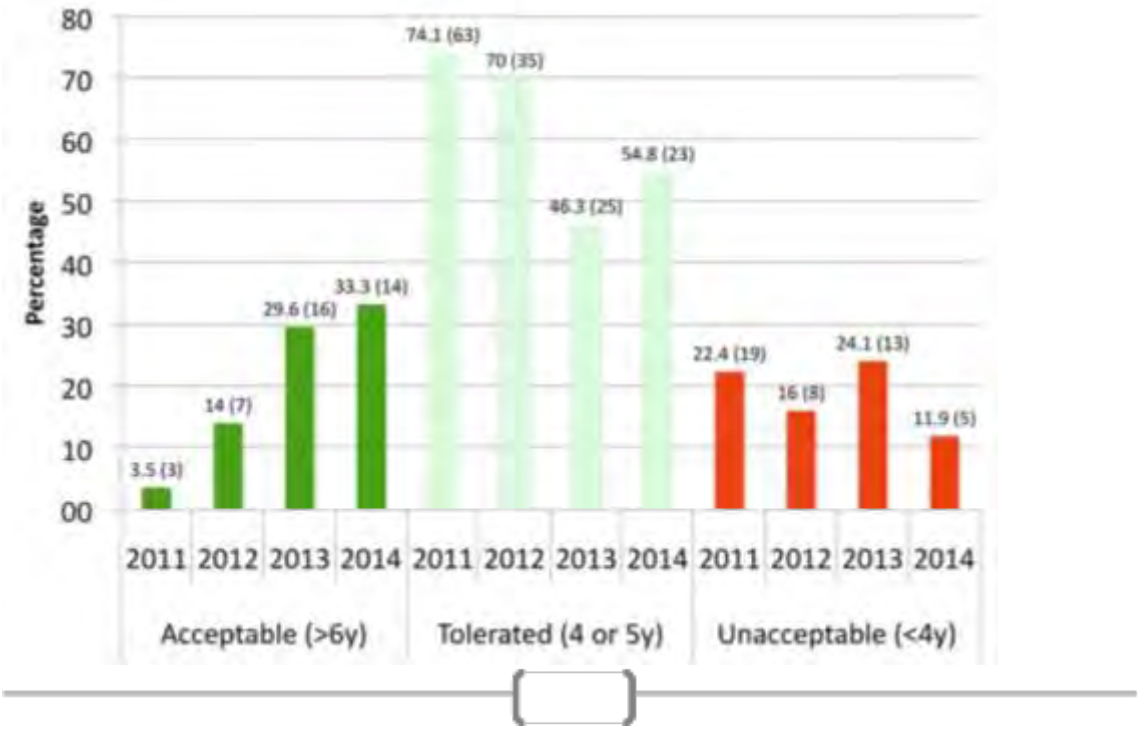
The age criterion, as it is currently practiced in Tanzania, provides an effective protection for young males but does not prevent the killing of reproductive active males. While this practice

does not seem to be detrimental for the population, when done in combination with the density restrictions, it might be possible to

improve the harvesting strategy with more insight into the local reproductive biology of lions.

The main characteristics used for the age assessment of male lions in Tanzania are mane development, pulp closure of premolars, abrasion of teeth, and nose coloration (White and Belant 2016; White et al. 2016). This combination provides very accurate results whereas guides developed for other areas (e.g. Whitman and Packer 2006) would lead to a strong underestimate of the age of lions from Selous.

Figure 11: Change in the age of lions killed in trophy hunting from TAWIRI (2016) (modified)



Compliance Measures

Without proper enforcement, legislation and management cannot take any effect. With respect to lion hunting in Tanzania, the following measures seem to be most important in terms of demonstrating a robust and transparent mechanism for controlling the age of trophies:

- ·Official Scouts appointed by TAWA are required to

accompany every hunt by law.

- ·A Safari return form (figure 13 and 14) has to be completed for each 21 or 28 days safari, whether successful or unsuccessful, which includes details about the circumstances and lion encounters.

- ·The hunting company has to take detailed measurements and pictures (e.g. nose color and extend of mane) as well as blood and skin samples for DNA analyses and deliver them with the skull to the management department.

- ·Since 2011, Tanzania has signed a Memorandum of Understanding with IGF Foundation which is a French based International organization for wildlife Conservation . IFG Foundation assists the Wildlife Division and now TAWA in organizing the collection and surveillance of lion trophies. Skulls are allocated a unique identification code and presented 'blind' to the Division for logging – i.e. without the client details. The lion skulls are measured and one upper pre-molar tooth is extracted and retained by the Wildlife Division for age assessment (by determining the width of the pulp cavity via X-ray radiography). According to all the collected data the age of the lion is assessed. These ageing sessions are conducted by Wildlife Division/TAWA staff in collaboration with experts from TAWIRI and IGF Foundation

- ·Blind controls of the age verification process have been carried out by independent researchers and species specialists

- ·All information is stored in a database. Tanzania's records of its implementation of the age restriction system are open to scrutiny to the international scientific community and returned forms and data outputs were examined during the field mission.

- ·A CITES export permit will not be issued unless all the above paperwork has been submitted and ageing verification checks completed.

- ·Beside a monetary fine, the denial of export permission and the reduction of the quota are used to encourage compliance.

Taken altogether, the current measurements seem to provide an effective mechanism for ensuring that hunting operators are complying with the age and sex restrictions.

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Sustainability of Lion Trophy Hunting in Tanzania

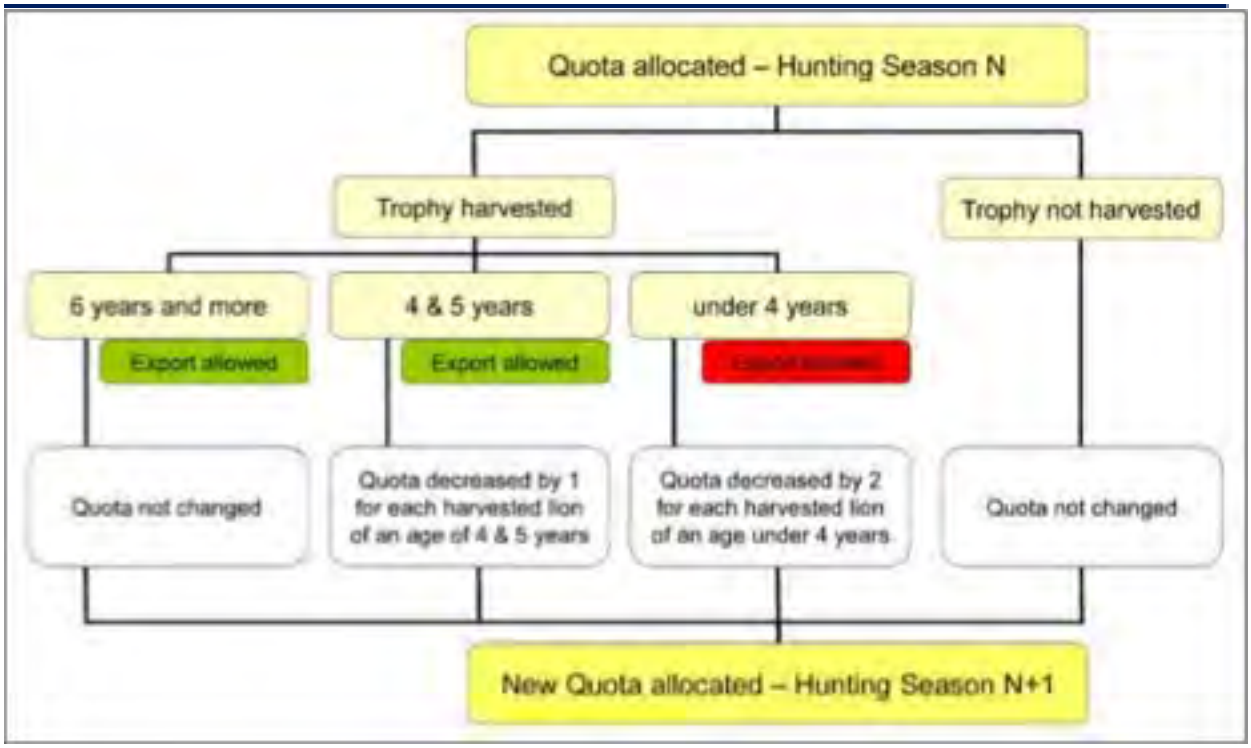

Figure 12: Sanctions for violations against the lion trophy hunting regulations of Tanzania from TAWIRI (2016)

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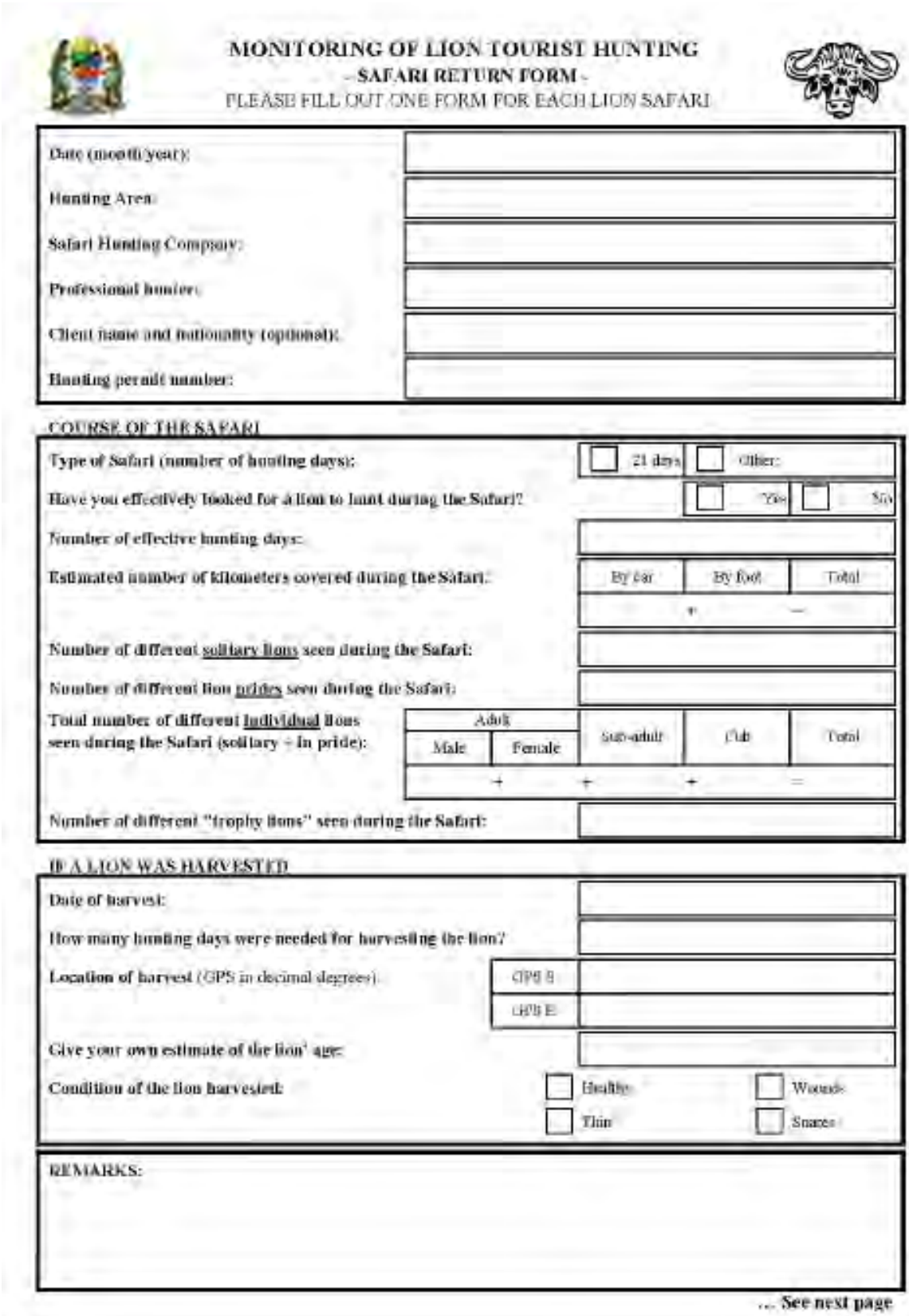
Sustainability of Lion Trophy Hunting in Tanzania



MONITORING OF LION TOURIST HUNTING
- SAFARI RETURN FORM -
PLEASE FILL OUT ONE FORM FOR EACH LION SAFARI

Date (month/year):	
Hunting Area:	
Safari Hunting Company:	
Professional hunter:	
Client name and nationality (optional):	
Hunting permit number:	

COURSE OF THE SAFARI

Type of Safari (number of hunting days):	☐ 21 days	☐ Other:	
Have you effectively looked for a lion to hunt during the Safari?	☐ Yes	☐ No	
Number of effective hunting days:			
Estimated number of kilometers covered during the Safari:	By car	By foot	Total
	+	=	
Number of different solitary lions seen during the Safari:			
Number of different lion prides seen during the Safari:			

Total number of different individual lions seen during the Safari (solitary + in pride):	Adult		Sub-adult	Cub	Total
	Male	Female			
	+	+	+	=	
Number of different "trophy lions" seen during the Safari:					

IF A LION WAS HARVESTED

Date of harvest:		
How many hunting days were needed for harvesting the lion?		
Location of harvest (GPS in decimal degrees):	GPS S:	
	GPS E:	
Give your own estimate of the lion' age:		
Condition of the lion harvested:	☐ Healthy	☐ Wounds
	☐ Thin	☐ Snares

REMARKS:

... See next page

Figure 13: Page 1 of the safari hunting return form used to collect data about trophy hunting on lions in Tanzania from TAWIRI (2016)

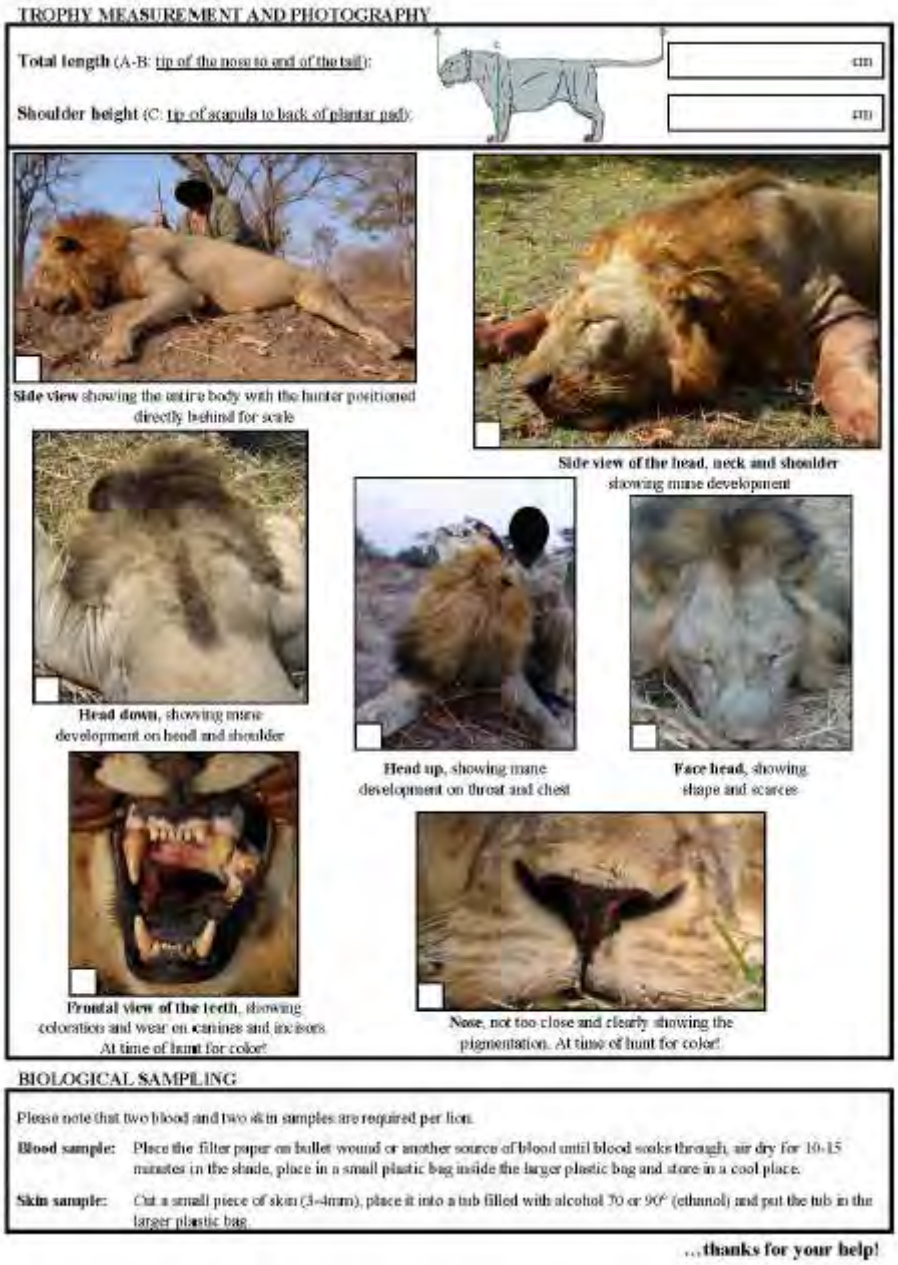
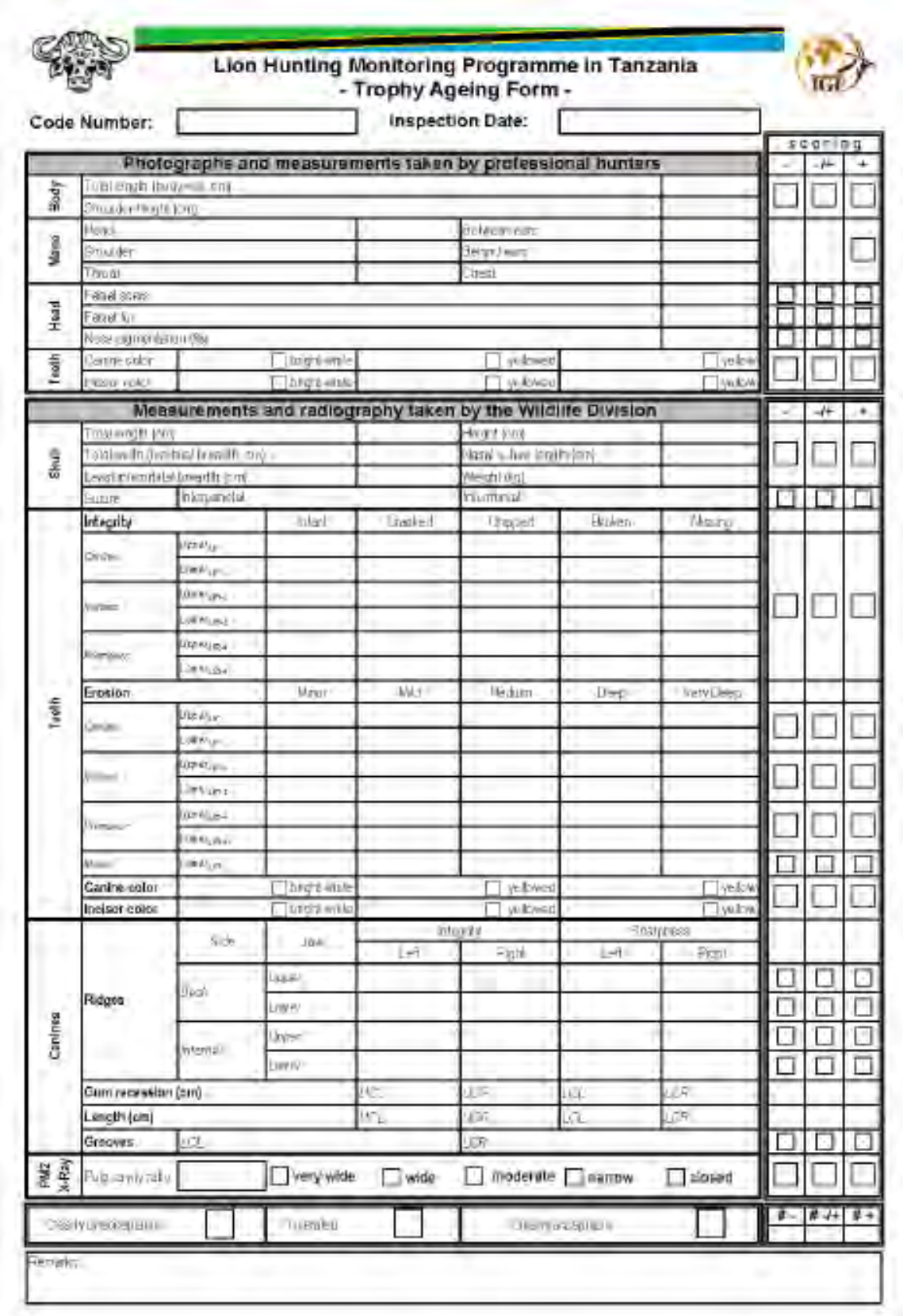


Figure 14: Page 2 of the safari hunting return form used to collect data about trophy hunting on lions in Tanzania from TAWIRI (2016)

Sustainability of Lion Trophy Hunting in Tanzania



Lion Hunting Monitoring Programme in Tanzania
- Trophy Ageing Form -

Code Number: Inspection Date:

scoring

Photographs and measurements taken by professional hunters

Body
Total length (body+skull, cm)
Shoulder height (cm)

Mane
Neck
Shoulder
Throat
Forehead mane
Behind ears
Chest

Head
Facial scars
Facial fur
Nose pigmentation (%)

Teeth
Canine color — bright white / yellowed / yellow
Incisor color — bright white / yellowed / yellow

Measurements and radiography taken by the Wildlife Division

Skull
Total weight (cm)
Height (cm)
Total width (external breadth, cm)
Nasal + bone length (cm)
Least interorbital breadth (cm)
Weight (kg)
Suture — Interparietal / Interfrontal

Teeth
Integrity — Intact / Cracked / Chipped / Broken / Missing
Canine — Upper Right / Upper Left / Lower Right / Lower Left
Incisor — Upper Right / Upper Left / Lower Right / Lower Left
Premolar — Upper Right / Upper Left / Lower Right / Lower Left
Erosion — Minor / Mid / Medium / Deep / Very Deep
Canine — Upper Right / Upper Left / Lower Right / Lower Left
Incisor — Upper Right / Upper Left / Lower Right / Lower Left
Premolar — Upper Right / Upper Left / Lower Right / Lower Left
Molar — Lower Left / Lower Right
Canine color — bright white / yellowed / yellow
Incisor color — bright white / yellowed / yellow

Canines
Ridges — Side (Back / Internal) — Jaw (Upper / Lower) — Integrity (Left / Right) — Sharpness (Left / Right)
Gum recession (cm) — UCL / LCL / UCR / LCR
Length (cm) — UCL / LCL / UCR / LCR
Grooves — UCL / LCR

PM2 X-Ray
Pulp cavity ratio — very wide / wide / moderate / narrow / closed

Cleanly prepared / Fractured / Discolored

Remarks:

Figure 15: Age assessment form used to collect data about the age of lions hunted in Tanzania from TAWIRI (2016)

Community Based Natural Resource Management (CBNRM)

Especially in a country with rapid population growth, humans and wild animals increasingly compete for resources. Involvement of rural communities in the decision making process and material incentives are essential to mitigate human-wildlife conflicts.

With the Wildlife Conservation Act enacted in 2009, Tanzania implements these principles into practice by grating the communities registered land ownership rights and allowing them to establish Wildlife Management Areas (WMAs) which are allowed to lease the hunting rights. The only restrictions to the sovereignty of the communities are a minimum hunting block fee, the allocation of quotas (the District Councils are represented in the competent committee), and the accounting of all monetary flows by the Director of Wildlife. None of these are necessarily a disadvantage for the communities. To reach the required minimum area for a hunting

block of 200 km2, several villages can make a joint venture. Rules and cash flow of the WMA system are transparent and well

documented (e.g. WWF 2014).

The success of this program was confirmed to us by all participants and the numbers reinforce this conclusion. Initially, 22 WMAs dedicated 36.000 km2 to the protection and sustainable use of wildlife, what equates 3% of the national territory and an increase to 50.000 km2 is in progress. These areas function as buffer zones between governmental sanctuaries and zones of

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Figure 16: Summary of facts related to the CBNRM in Tanzania after information received during the field mission

intense human activities and ease the migration and recolonization within the lion metapopulational (Dolrenry et al. 2014).

Currently 54 out of 63 district councils profit from income accruing from the hunting industry. The WMAs contribute to the protection of wildlife by obligatory conducting anti-poaching patrols, supervision of trophy hunting and collecting data about the wildlife and reports violations.

Human-Wildlife Conflicts

According to Tanzanian law, killing lions in self-defence is allowed if they threaten human life or livestock. With a population growth from 13,6 million in 1970 to about 50 million today and a widespread tradition that considers cattle as the most important status symbol, Tanzania is in a difficult situation where retaliation killings are the prime cause for unnatural death of lions.

Less than 10 lions are annually killed officially through Problem Animal Control (PAC) but about 200 are killed in retaliation for livestock losses or human attacks or preventively. On average, 10 attacks occur each year on humans and over 150 on livestock but there are also reports of much higher levels, for example 35 people were reported to have been killed by one or a group of lions within 20 months (Baldus 2004). In general, lion attacks increased over the last decades and are motivated by predation attempts (Ikanda 2009).

A register about all reported lion attacks is kept and inspections revealed almost 90% accurate reporting. Considering these facts, it seems of little importance that Tanzania does not have any criteria to recognize a problem animal, besides a list of eligible species.

The presence of predators has the potential to cause sustained psychological stress (Clinchy et al. 2013) and even if casualties can be kept on a low level, the acceptance of a life-threatening predator in the vicinity of human settlements will be extremely low (Dickman et al. 2014). Lions usually attack adult cattle and donkeys and often do so at daylight what makes them very vulnerable to direct retaliation killings (Kissui 2008). Compared to other predators, incidences with lions in the vicinity of the Serengeti National Park occur only close to the protected area (Holmern et al. 2007). This could indicate that in this region a habitation of lions outside of the park borders became extremely unlikely. Similar observation are reported from Katavi (Kiffner et al. 2009). Considering a projected increase of the human population by 500 % or more until 2100 and a stock of about 27 million cattle (compared to 2,6 million in Botswana), it cannot be expected that Tanzania will be able to prevent a further increase of human-wildlife conflicts.

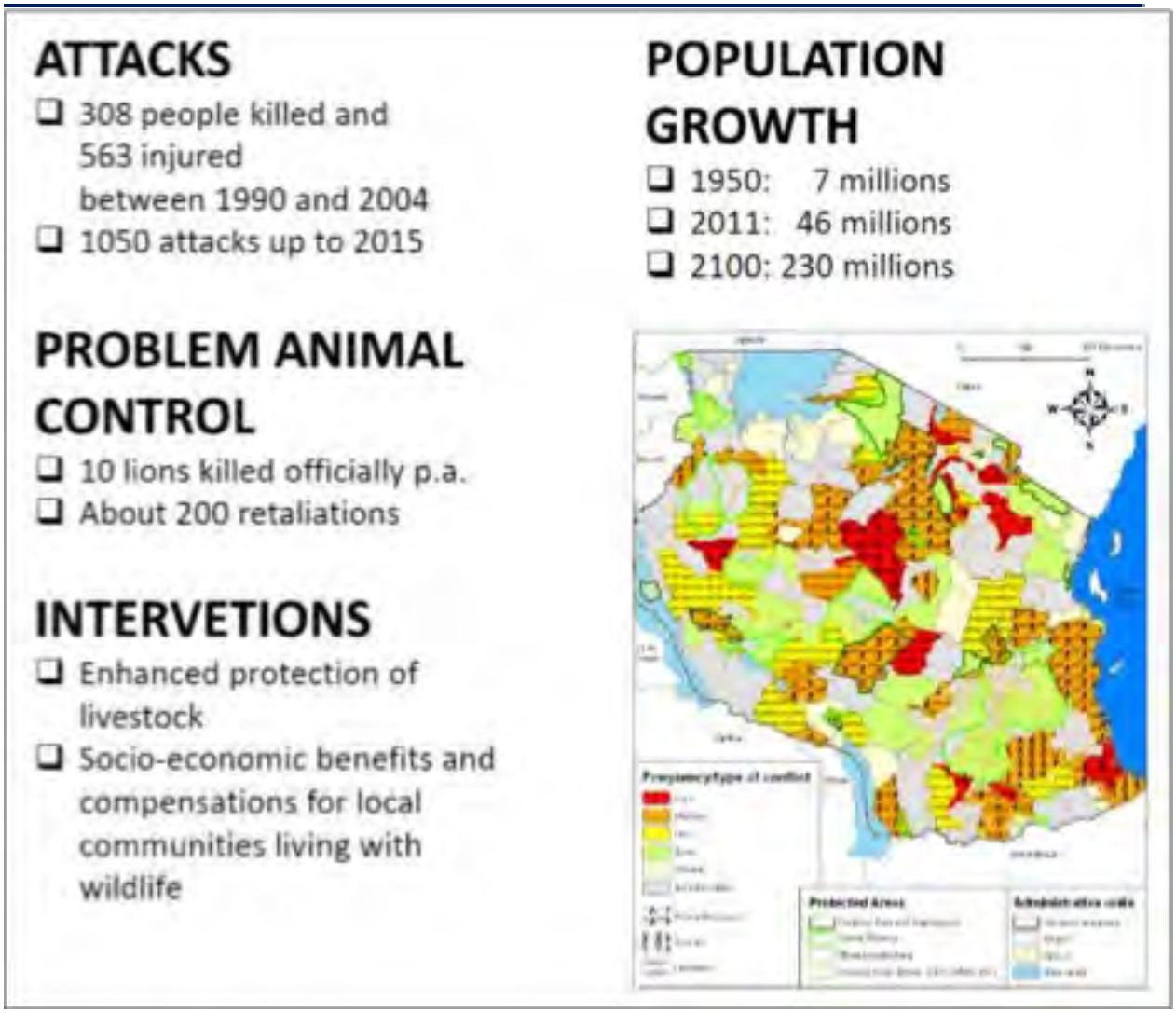

Figure 17: Summary of facts related to human-wildlife conflicts with lions based on TAWIRI (2016)

This threat to human lives puts a major responsibility on to the wildlife authorities and they employ various mitigation measures for human-lion conflict management, including securing bomas (corral) with wire mesh (Abade et al. 2014) and a consolation scheme for victims. Whilst prevention of conflict is the key to coexistence, ensuring that people perceive the lions more positively can also work to achieve greater tolerance, which includes the possibility of generating income through trophy hunting.

Hunting Industry

In Tanzania, hunting is a well-developed and organized business sector (represented by the Tanzania Hunting Operators Association TAHOA) with a considerable contribution to wildlife conservation and some contribution to the alleviation of poverty (Di Minin et al. 2016). During the field mission, even a representative of the photo tourism industry confirmed the necessity of hunting for the Tanzanian wildlife conservation management.

Figure 18: Basics about the organization of hunting in Tanzania after information received during the field mission

Figure 19: Summary about obligations and contributions of the hunting industry after TAWIRI (2016) and information received during the field mission.

Hunting blocks are auctioned, as proposed by Macdonald (2016), and contributions to anti- poaching and social development of neighbouring communities are a mandatory element

of the bid. During the field mission several wildlife officers emphasized that without the cars, field guides, and surveillance provided by the hunting companies it would be impossible to fight poaching activities and push back the unregulated conversion of wildlife protected areas to other form of land use. Equally important is the direct income TAWA generates by issuing hunting licenses (4650$ + 18%VAT per 21 day license).

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Sustainability of Lion Trophy Hunting in Tanzania

Hunting enterprises are a commercial business model and sinking earnings in the course of import bans for iconic species reduced their willingness to invest. More than 50% of the customers are US citizens and 40% are Europeans. Hence, the hunting companies claim a 30% revenue loss following the import ban on lion and elephant trophies by these regions.

Especially for new and inexperienced companies it seems to be challenging to attract enough costumers and as a result the market is dominated by few large companies. The difficulty of the terrain and intensive rainy seasons (Selous is only accessible by car from July to December except by a few watershed roads on the hilltops) are among the many complications that the hunting industry of Tanzania faces.

Currently, 47 out of 157 hunting bock are vacant in Tanzania and therefore the auctions fetch suboptimal results and demands to lower the prices for hunting licenses arise. Even more detrimental for the conservation of lions could be the option to hunt unsustainably and move to another plot when the game population is depleted. An extension of the lease lengths could be a necessary countermeasure (Brink et al. 2016). Although, even responsible entrepreneurs tend to move out of hunting blocks if tribes constantly invade the area.

Compliance with the age restrictions requires considerable knowledge, and errors in the field cannot be excluded. However, the current penalties seem to provide sufficient incentives to comply and increasingly Hunting Block operators are investing in camera traps, to assist in identifying suitable lions. This has the potential to reduce the killing of too young specimens.

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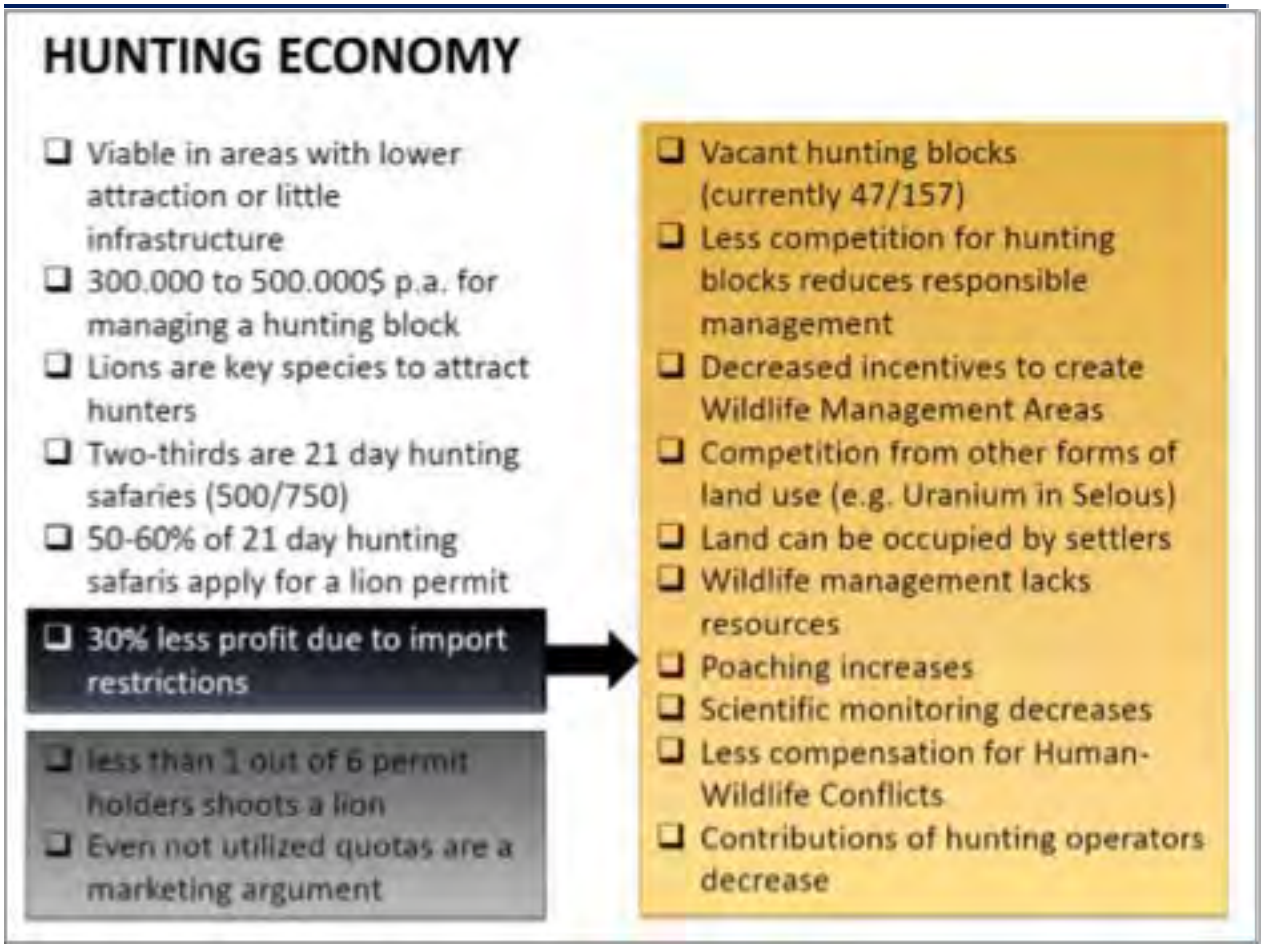

Figure 20: Summary about interdependencies between hunting and conservation of lions in Tanzania after information received during the field mission

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Consequences of Hunting

It is unknown to what extent differences in local population densities have been caused by unsustainable hunting in previous decades and hard to predict how the populations will develop under the current management practice. Currently, lion density is highest in national parks and declining with the protection status of the area.

Conservation concerns related to lion trophy hunting are usually focused on population size and trends. In addition to these quantitative considerations, more attention should be payed to the impacts on the genepool, behaviour, and social structure.

During the field mission we learned, that in Selous lions are seen more frequently during the wet season when they are not hunted. This indicates that lions are able to recognize hunting as a threat and adapts its behaviour within short time. Furthermore, we received conflicting reports that sometimes lion are emigrating from areas where they are hunted and that in contrast hunting has no effects on the behaviour of lions. If hunting drives animals from the core to the periphery of protected areas this could increase human-wildlife conflicts and retaliation killings. The effects of humans as “super predators” (Clinchy et al. 2016) seem to be poorly understood and research could provide valuable information for the management of the species.

According to some unpublished data we received from Dennis Ikanda, the gender ratio of nine prides around Kingupira shifted from 1:2 to 1:3 as a result of the sex restrictions for trophy hunting but the size did not change from 1967 to 1975 and 2013. Similar shifts have been reported from photographic tourism sectors of Selous (Brink et al. 2013) and other parts of the African lion range (Bouché et al. 2016). Hence, other factors besides hunting might be involved. In addition the number of prides in the area remained within a constant range. This could indicate that in this area, hunting had no effect on the reproductive output of the population. The shift in the sex ratio might also reduce the aggressive conflicts between males and overturn of pride males with a reduction of the mortality resulting thereof. However, more research is needed to confirm these assumptions.

Recommendations to Tanzania

- Fast reactions to any kind of serious information about a rapid population decline and regular updates for the estimated size of the national lion population, including results from the latest surveys, would enhance the confidence that others have in Tanzania's commitment to conserve its lion populations.

- It should be considered to restrict trophy hunting on lions to areas where a population survey has been conducted within a reasonable period which is defined according to the local threat, national importance of the population, and annual offtake.

- The use of camera traps to identify suitable lions to hunt should be encouraged. This would further reduce the taking of animals less than 6 years of age and assist with quota allocation.

- Roads make the surveillance of an area easier. On the other hand, inaccessibility by roads provides the most effective protection for the wildlife of large reserves, such as Selous. Therefore, the advantages of upgrading and maintaining the road system (e.g. by a hunting block owner) needs to be balanced against the risks to the conservation of the wildlife and habitat it runs through.

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- ·Mr. Herman Keraryo, former Director of Wildlife, Ministry of Natural Resources and Tourism, Wildlife Division

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Summary

Even if considering only lion trophy hunting, it is a considerable challenge to provide a consistent picture of the conservation status and management quality for a large and diverse country, such as Tanzania. Taking all the possibly detrimental factors into account (Kideghesho et al. 2013), it seems likely that the lion population of Tanzania will continue to decline outside of protected areas (Riggio et al. 2013). However, under the current circumstances controlled trophy hunting helps to mitigate the losses. In addition, incentives to dedicate additional areas to the conservation of wildlife depend to a large extend on the revenues from trophy hunting and these again are strongly correlated with the availability of iconic species, such as lions.

Tanzania has several large protected lion populations with a relatively stable population trend, the current management practice should be sufficient to prevent hunting from being detrimental and able to conserve the long-term survival of the national lion population. During the last years, Tanzania has increased its awareness for the need to survey and manage the national lion population and reached a conservation level which is in accordance with CoP17 Res. 17.9 and the self-imposed requirements of the European Union for allowing the import of hunting trophies. Based on the findings of the field mission and the available literature we are confident, that it is possible to recommend a positive SRG opinion for the import of lion trophies from Tanzania.

Nevertheless, it has to be acknowledged that the conservation of lions will provide a continuing or even increasing challenge for Tanzania. The current management practice and the dedication and enthusiasm of those who are in charge are promising. However, rapid reactions to rumours about a local crises and continued research are indispensable and without continuing efforts, questions about the sustainability of trophy hunting on this species will raise again.

Literature

Abade, L., D. W. Macdonald, and A. J. Dickman. 2014. Assessing the relative importance of landscape and husbandry factors in determining large carnivore depredation risk in Tanzania's Ruaha landscape. Biol. Conserv. 180:241–248.

Anderson, C. J. R., N. D. V. Lobo, J. D. Roth, and J. M. Waterman. 2010. Computer-aided photo- identification system with an application to polar bears based on whisker spot patterns. J. Mammal. 91:1350–1359.

Anonymus. 2013. Safari Hunting in Tanzanaia. Ministry of Natual Resources and Tourism. Baldus, R. D. 2004. Lion Conservation in Tanzania Leads to Serious Human – Lion Conflicts: With a Case Study of a Man-Eating Lion Killing 35 People. GTZ Wildlife Programme in Tanzania, Daressalam.

Bauer, H., G. Chapron, K. Nowell, P. Henschel, P. Funston, L. T. B. Hunter, D. W. Macdonald, and C. Packer. 2015a. Lion (Panthera leo) populations are declining rapidly across Africa, except in intensively managed areas. Proc. Natl. Acad. Sci. 112:14894–14899.

Bauer, H., G. Chapron, K. Nowell, P. Henschel, P. Funston, L. T. Hunter, D. W. Macdonald, S. M. Dloniak, and C. Packer. 2015b. Reply to Riggio et al.: Ongoing lion declines across most of Africa warrant urgent action. Proc. Natl. Acad. Sci. 201522741.

Bauer, H., C. Packer, P. Funston, P. Henschel, and K. Nowell. 2016. Panthera leo. The IUCN Red List of Threatened Species 2016: e.T15951A107265605.

Borgerhoff Mulder, M., E. B. Fitzhernert, J. Mwalyoyo, and J. Mahenge. 2009. The national Sukuma expansion and Sukuma lion conflict. Panthera.

Bouché, P., W. Crosmary, P. Kafando, B. Doamba, F. C. Kidjo, C. Vermeulen, and P. Chardonnet. 2016. Embargo on Lion Hunting Trophies from West Africa: An Effective Measure or a Threat to Lion Conservation? PLOS ONE 11:e0155763.

Brink, H., R. J. Smith, and K. Skinner. 2013. Methods for lion monitoring: a comparison from the Selous Game Reserve, Tanzania. Afr. J. Ecol. 51:366–375.

Brink, H., R. J. Smith, K. Skinner, and N. Leader-Williams. 2016. Sustainability and Long Term-Tenure: Lion Trophy Hunting in Tanzania. PLOS ONE 11:e0162610.

Brockington, D. 2008. Preserving the new Tanzania: Conservation and land use change. Int. J. Afr. Hist. Stud. 41:557–579.

Caro, T. 2008. Decline of large mammals in the Katavi-Rukwa ecosystem of western Tanzania. Afr. Zool. 43:99–116.

Caro, T. 2011. On the merits and feasibility of wildlife monitoring for conservation: a case study from Katavi National Park, Tanzania. Afr. J. Ecol. 49:320–331.

Clinchy, M., M. J. Sheriff, and L. Y. Zanette. 2013. Predator-induced stress and the ecology of fear. Funct. Ecol. 27:56–65.

Clinchy, M., L. Y. Zanette, D. Roberts, J. P. Suraci, C. D. Buesching, C. Newman, and D. W. Macdonald. 2016. Fear of the human “super predator” far exceeds the fear of large carnivores in a model mesocarnivore. Behav. Ecol. arw117.

Creel, S., M. S. Becker, S. M. Durant, J. M’Soka, W. Matandiko, A. J. Dickman, D. Christianson, E. Dröge, T. Mweetwa, N. Pettorelli, E. Rosenblatt, P. Schuette, R. Woodroffe, S. Bashir, R. C. Beudels-Jamar, S. Blake, M. Borner, C. Breitenmoser, F. Broekhuis, G. Cozzi, T. R. B. Davenport, J. Deutsch, L. Dollar, S. Dolrenry, I. Douglas-Hamilton, E. Fitzherbert, C. Foley, L. Hazzah, P. Henschel, R. Hilborn, J. G. C. Hopcraft, D. Ikanda, A. Jacobson, B. Joubert, D. Joubert, M. S. Kelly, L. Lichtenfeld, G. M. Mace, J. Milanzi, N. Mitchell, M. Msuha, R. Muir, J. Nyahongo, S. Pimm, G. Purchase, C. Schenck, C. Sillero-Zubiri, A. R. E. Sinclair, A. N. Songorwa, M. Stanley-Price, C. A. Tehou, C. Trout, J. Wall, G. Wittemyer, and A. Zimmermann. 2013. Conserving large populations of lions - the argument for fences has holes. Ecol. Lett. 16:1413-e3.

Creel, S., J. M'soka, E. Dröge, E. Rosenblatt, M. S. Becker, W. Matandiko, and T. Simpamba. 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy. Ecol. Appl., doi: 10.1002/eap.1377.

Crosmary, W.-G., D. Ikanada, F. A. Ligate, Kasanga Imani, Mkuburo Lameck, Lyamuya Richard, Ngongolo Kelvin, Sandini Pietro, and C. Philippe. 2016. The Selous Game Reserve is still a stronghold for African lions, Tanzania.

Cusack, J. J., A. Swanson, T. Coulson, C. Packer, C. Carbone, A. J. Dickman, M. Kosmala, C. Lintott, and J. M. Rowcliffe. 2015. Applying a random encounter model to estimate lion density from camera traps in Serengeti National Park, Tanzania: Density Estimation of Serengeti Lions. J. Wildl. Manag. 79:1014–1021.

Davidson, Z., and N. Ellitot. n.d. Spoor Manual. DeMarco, E. 2015. East, West Africa could lose 50% of their lions by 2035. Science, doi:

10.1126/science.aad4775. Di Minin, E., N. Leader-Williams, and C. J. Bradshaw. 2016. Banning trophy hunting will exacerbate

biodiversity loss. Trends Ecol. Evol. 31:99–102. Dickman, A. J., L. Hazzah, C. Carbone, and S. M. Durant. 2014. Carnivores, culture and "contagious

conflict": Multiple factors influence perceived problems with carnivores in Tanzania's Ruaha

landscape. Biol. Conserv. 178:19–27. Dolrenry, S., J. Stenglein, L. Hazzah, R. S. Lutz, and L. Frank. 2014. A Metapopulation Approach to African

Lion (Panthera leo) Conservation. PLoS ONE 9:e88081. Durant, S. M., M. E. Craft, R. Hilborn, S. Bashir, J. Hando, and L. Thomas. 2011. Long-term trends in

carnivore abundance using distance sampling in Serengeti National Park, Tanzania: Serengeti

carnivore trends. J. Appl. Ecol. 48:1490–1500. Funston, P. J., L. Frank, T. Stephens, Z. Davidson, A. Loveridge, D. M. Macdonald, S. Durant, C. Packer, A.

Mosser, and S. M. Ferreira. 2010. Substrate and species constraints on the use of track 36

incidences to estimate African large carnivore abundance: Track indices for African carnivores. J.

Zool. 281:56–65. Haas, S. K., V. Hayssen, and P. R. Krausman. 2005.

Panthera leo. Mamm. Species 1–11. Hayward, M., J. Obrien, and G. Kerley. 2007. Carrying capacity of large African predators: Predictions and

tests. Biol. Conserv. 139:219–229. Holmern, T., J. Nyahongo, and E. Røskaft. 2007. Livestock loss caused by predators outside the Serengeti

National Park, Tanzania. Biol. Conserv. 135:518–526. Ikanda, D. K. 2009. Dimensions of a human-lion conflict: the ecology of human predation and

persecution of African lions Panthera leo in Tanzania. Ikanda, D., M. MSUHA, B. KISSUI, C. KIFFNER, P. CHARDONNET, and T. CARO. 2016. African lion panthera

leo and leopard Panthera pardus population status survey in Katavi Rukwa ecosystem, Tanzania.

TANZANIA WILDLIFE RESEARCH INSTITUTE. Ikanda, D., and C.

Packer. 2006. Lion Abundance and Distribution in Tanzania. IUCN. 2014. Panthera leo: Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K.: The IUCN

Red List of Threatened Species 2015: e.T15951A79929984. Kideghesho, J., A. Rija, K. Mwamende, and I. Selemani. 2013. Emerging issues and challenges in

conservation of biodiversity in the rangelands of Tanzania. Nat. Conserv. 6:1–29. Kiffner, C., B. Meyer, M. Mühlenberg, and M. Waltert. 2009. Plenty of prey, few predators: what limits

lions Panthera leo in Katavi National Park, western Tanzania? Oryx 43:52. Kissui, B. M. 2008. Livestock predation by lions, leopards, spotted hyenas, and their vulnerability to

retaliatory killing in the Maasai steppe, Tanzania. Anim. Conserv. 11:422–432. Kissui, B. M., and C. Packer. 2004. Top-down population regulation of a top predator: lions in the

Ngorongoro Crater. Proc. R. Soc. B Biol. Sci. 271:1867–1874. Laizer, H. 2014. Demography of lions (panthera leo) in tarangire national park, tanzania.

Sustainability of Lion Trophy Hunting in Tanzania

Lindsey, P. A., G. A. Balme, P. Funston, P. Henschel, L. Hunter, H. Madzikanda, N. Midlane, and V. Nyirenda. 2013. The Trophy Hunting of African Lions: Scale, Current Management Practices and Factors Undermining Sustainability. PLoS ONE 8:e73808.

Macdonald, D., K. Jacobsen, D. Burnham, P. Johnson, and A. Loveridge. 2016. Cecil: A Moment or a Movement? Analysis of Media Coverage of the Death of a Lion, Panthera leo. Animals 6:26. Macdonald, D. W. 2016. Report on Lion Conservation with Particular Respect to the Issue of Trophy

Hunting. WildCRU, Oxford. Mésochina, P., O. Mbangwa, P. Chardonnet, R. Mosha, B. Mtui, N. Drouet, and B. Kissui. 2010.

Conservation status of the lion (Panthera leo Linnaeus, 1758) in Tanzania. Paris Fr. SCI Found.

MNRT-WD TAWISA IGF Found. Miller, J. R. B., G. Balme, P. A. Lindsey, A. J. Loveridge, M. S. Becker, C. Begg, H. Brink, S. Dolrenry, J. E.

Hunt, I. Jansson, D. W. Macdonald, R. L. Mandisodza-Chikerema, A. O. Cotterill, C. Packer, D. Rosengren, K. Stratford, M. Trinkel, P. A. White, C. Winterbach, H. E. K. Winterbach, and P. J. Funston. 2016. Aging traits and sustainable trophy hunting of African lions. Biol. Conserv. 201:160–168.

Minstery of Natual Resources and Tourism. 2014. National Strategy to Combat

Poaching and Illegal Wildlife Trade. Ministry of Natual Resources and Tourism.

Packer, C., H. Brink, B. M. Kissui, H. Maliti, H. Kushnir, and T. Caro. 2011. Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania: Trophy Hunting of Lions and Leopards. Conserv. Biol. 25:142–153.

Packer, C., D. Ikanda, B. Kissui, and H. Kushnir. 2005. Conservation biology: lion attacks on humans in Tanzania. Nature 436:927–928.

Packer, C., M. Kosmala, H. S. Cooley, H. Brink, L. Pintea, D. Garshelis, G. Purchase, M. Strauss, A. Swanson, G. Balme, L. Hunter, and K. Nowell. 2009. Sport Hunting, Predator Control and Conservation of Large Carnivores. PLoS ONE 4:e5941.

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Sustainability of Lion Trophy Hunting in Tanzania

Packer, C., A. Loveridge, S. Canney, T. Caro, S. T. Garnett, M. Pfeifer, K. K. Zander, A. Swanson, D. MacNulty, G. Balme, H. Bauer, C. M. Begg, K. S. Begg, S. Bhalla, C. Bissett, T. Bodasing, H. Brink, A. Burger, A. C. Burton, B. Clegg, S. Dell, A. Delsink, T. Dickerson, S. M. Dloniak, D. Druce, L. Frank, P. Funston, N. Gichohi, R. Groom, C. Hanekom, B. Heath, L. Hunter, H. H. DeIongh, C. J. Joubert, S. M. Kasiki, B. Kissui, W. Knocker, B. Leathem, P. A. Lindsey, S. D. Maclennan, J. W. McNutt, S. M. Miller, S. Naylor, P. Nel, C. Ng'weno, K. Nicholls, J. O. Ogutu, E. Okot-Omoya, B. D. Patterson, A. Plumptre, J. Salerno, K. Skinner, R. Slotow, E. A. Sogbohossou, K. J. Stratford, C. Winterbach, H. Winterbach, and S. Polasky. 2013a. Conserving large carnivores: dollars and fence. Ecol. Lett. 16:635–641.

Packer, C., A. Swanson, S. Canney, A. Loveridge, S. Garnett, M. Pfeifer, A. C. Burton, H. Bauer, and D. MacNulty. 2013b. The case for fencing remains intact. Ecol. Lett. 16:1414-e4.

Packer, C., K. Whitman, A. J. Loveridge, J. Jackson, and P. Funston. 2006. Impacts of trophy hunting on lions in East and Southern Africa: Recent offtake and future recommendations. P. in Background paper for the Eastern and Southern African lion conservation workshop, Johannesburg, South Africa.

Pennycuick, C. J., and J. Rudnai. 1970. A method of identifying individual lions Panthera leo with an analysis of the reliability of identification. J. Zool.

160:497–508.

Riggio, J., T. Caro, L. Dollar, S. M. Durant, A. P. Jacobson, C. Kiffner, S. L. Pimm, and R. J. van Aarde. 2016. Lion populations may be declining in Africa but not as Bauer et al. suggest. Proc. Natl. Acad. Sci. 113:E107–E108.

Riggio, J., A. Jacobson, L. Dollar, H. Bauer, M. Becker, A. Dickman, P. Funston, R. Groom, P. Henschel, H. de Iongh, L. Lichtenfeld, and S. Pimm. 2013. The size of savannah Africa: a lion's (Panthera leo) view. Biodivers. Conserv. 22:17–35.

Spong, G. 2002. Space use in lions, Panthera leo, in the Selous Game Reserve: social and ecological factors. Behav. Ecol. Sociobiol. 52:303–307.

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Sustainability of Lion Trophy Hunting in Tanzania

Spong, G., J. Stone, S. Creel, and M. Björklund. 2002. Genetic structure of lions (Panthera leo L.) in the Selous Game Reserve: implications for the evolution of sociality. J. Evol. Biol. 15:945–953.

TAWIRI Wildlife Division and TAWA. 2016. Non-detriment findings on African lion (Panthera leo) in the United Republic of Tanzania, including Enhancement findings June. Ministry of Natual Resources and Tourism - Wildlife Division.

UNEP-WCMC. 2016. Review of Panthera leo from Tanzania and Zambia. UNEP - WCMC, Cambridge. White, P. A., and J. L. Belant. 2016. Individual variation in dental characteristics for estimating age of

African lions. Wildl. Biol. 22:71–77. White, P. A., D. Ikanda, L. Ferrante, P. Chardonnet, P. Mesochina, and R. Cameriere. 2016. Age Estimation

of African Lions Panthera leo by Ratio of Tooth Areas. PLOS ONE 11:e0153648. Whitman, K., and C. Packer. 2006. A Hunter's Guide to Aging Lions in Eastern and Southern Africa.

Conservation Force. WWF. 2014. Tanzania's Wildlife Management Areas: A 2012 Status Report. Dar es salam. 2013. Wildlife Subsector Statistical

Bulletin 2013. Ministry of Natual Resources and Tourism, Tanzania.

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In Reply Refer To:
FWS/AIA/DMA/PRT-07512D

Enhancement Finding
Applicant: Mathieu K. Destruel

I. Summary:

Mr. Destruel submitted an application on September 12, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Tanzania for the purpose of enhancing the propagation or survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion from Tanzania requires prior issuance of a CITES export permit from the CITES Management Authority of Tanzania, and import into the United States requires prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Tanzania, and other information available to the Service, the Service has determined that the sport-hunted trophy taken by Mr. Destruel on August 12, 2018, from the Kizigo Game Reserve E2, Manyoni-Singida, central Tanzania, **meets** the enhancement criteria under 50 CFR 17.32.

The Service recognizes that legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. We consider whether the management program is actively addressing the current and longer term threats to the subspecies based on sound scientific principles. A management program for a species such as *P. l. melanochaita* is expected to address, at a minimum, an evaluation of population trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating whether the importation of Mr. Destruel's trophy of *P. l. melanochaita* would be authorized in accordance with our permit issuance criteria, we were particularly interested in examining how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We evaluated how, and how well, the hunting component of the management program addresses these threats by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. We also considered how the participation of a U.S. hunter, in this case, Mr. Destruel, contributes to the overall management of lions within a country.

We work closely with the range countries and interested parties to obtain relevant information. The government of Tanzania has provided a series of documents, including Tanzania's

"enhancement"[1] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Destruel's application, the Tanzania Wildlife Research Institute (TAWIRI), open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

II. U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule that, effective January 22, 2016, listed the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act (USFWS 2015; 80 Fed. Reg. 79999); this species is regulated under a species-specific 4(d) rule of the Act, which is set forth at 50 CFR17.40(r).

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the rule contains the applicable prohibitions and exceptions for the specific species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita* (50 CFR 17.40(r)), all of the prohibitions of 50 CFR 17.31 and permit provisions of 50 CFR 17.32 apply. The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of a commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out these otherwise prohibited activities, including importation, under certain circumstances (e.g., scientific purposes or activities that enhance the propagation or survival of the species), in accordance with the Service's regulations at 50 CFR 17.32. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild (USFWS 2015; 80 Fed. Reg. 79999); 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the issuance criteria under 50 CFR 17.32. However, in some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has made the required enhancement finding based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

[1] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

A. General ESA permitting requirements

As we explained when finalizing the 4(d) rule, our threatened species permitting regulations provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the population in the country where the specimen originated and whether that management of the population addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Tanzania contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of Tanzania's lion management plan provides a net benefit to the subspecies and its ecosystem. For example, several components of a management plan by which trophy imports could meet the issuance criteria might be government incentives in place that lead to increased habitat protection for lions by private landowners and communities, and incentives provided to local communities that lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions.

The Service evaluates an application involving a *P. l. melanochaita* sport-hunted trophy in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b), the following:

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

B. IUCN guiding principles

In addition to these factors, specifically in relation to sport-hunting, in the 4(d) rulemaking for *P.l. melanochaita*, the Service explained it considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P.l. melanochaita*. The Service has, therefore, considered these principles in conjunction with our threatened species issuance criteria in making our determination of enhancement concerning import of the sport-hunted *P. l. melanochaita* trophy that is the subject of this permit application. The IUCN document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources". It recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and, more specifically, the conservation of the hunted species.(IUCN SSC, 2012)

The IUCN document lays out the following five guiding principles:

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure

that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to developing enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the ESA. Before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

III. Basis for Finding:

As explained above, any person wishing to conduct an otherwise prohibited activity, including import of *P. l. melanochaita* specimens, must first obtain a permit as required by 50 CFR 17.32; issuance of an import permit for a sport-hunted trophy of *P. l. melanochaita* requires an enhancement finding.

The Service has made the required enhancement finding for this import permit based on this individual application to import a sport-hunted trophy of *P. l. melanochaita* taken in Tanzania. Additionally, as detailed below, relevant information obtained for Tanzania as a whole, has been considered. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"[2] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Destruel's application, the TAWIRI, open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

On April 14, 2016, the Service sent a letter to Mr. Herman Keraryo, Acting Director of Wildlife for the Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT), with a list

[2] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

of questions that would aid the Service in evaluating the overall conservation and management of the lion population in Tanzania, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to our April 14, 2016 letter, the MNRT provided a series of documents, including Tanzania's "enhancement" and non-detriment finding for lions.

Upon invitation, a U.S. delegation of Service personnel visited Tanzania in November 2018 to observe the challenges and successes of conserving wildlife, including lions, in Tanzania. This trip allowed first-hand exposure to the on-the-ground implementation of policies and procedures the government has put into place to conserve lions. Detailed discussions with government officials, national experts, land managers, game officers, village leaders, and leaders in the hunting industry, as well as site visits to different models of hunting operations, served to both substantiate and elucidate information provided in documents. We determined that the status of lions and the management approach of Tanzania are substantially as presented, conferring confidence to the conclusions drawn from information provided.

IV. Governance of Wildlife in Tanzania:

In Tanzania, wildlife resources, such as lions, are protected under several Acts of Parliament, establishing the authority for all aspects of wildlife management, including law enforcement activities. The **Wildlife Conservation Act** (WCA) of 2009, which replaced the original WCA of 1974, provides the legal framework for operation of the Wildlife Division under the MNRT, including the appointment of the Director of Wildlife. The WCA provides for the establishment of a Wildlife Protection Unit granted paramilitary status to protect wildlife against unlawful utilization, and a Wildlife Authority to manage all Tanzania wildlife located outside the boundaries of the National Parks and the Ngorongoro Conservation Area. The Wildlife Authority is also responsible for meeting international obligations involving wildlife conservation. The WCA ensures the protection of natural habitat and wildlife through the establishment of a network of Protected Areas (PAs), e.g., Game Reserves, Game Controlled Areas, Wildlife Management Areas, and areas such as wildlife corridors. The **National Parks Act** (CAP 282 R.E. 2002) establishes the legal authority for the creation and management of national parks, granting powers to the Director to enable maintenance and security within national parks, as well as the responsibility for the protection of their wildlife resources. The **Ngorongoro Conservation Act** (CAP 284 R.E. 2002) provides the legal framework for the existence of the multiple land use in the Ngorongoro Conservation Area, its Management Authority under the direction of the Conservator, and the authority for its maintenance and security. The **TAWIRI Act** (CAP 260 R.E. 2002) grants powers to the Director who is responsible for research involving wildlife, and for providing this information to the Wildlife Authorities.

The responsibility for managing Tanzania's wildlife currently falls primarily under four institutions. The **Tanzania Wildlife Research Institute** (TAWIRI) is responsible for conducting and coordinating wildlife research in Tanzania. It functions as the scientific authority for wildlife conservation and management, and the CITES Scientific Authority for Tanzania. The **Tanzania National Parks Authority** (TANAPA) is responsible for managing 15 National Parks with a

total area of 50,872 sq.km. In the national parks, only non-consumptive utilization (tourism game viewing) of wildlife resources is allowed. **Ngorongoro Conservation Area Authority** (NCAA) is responsible for management of only one area, the Ngorongoro Conservation Area, a protected area of 8,300 km^2. It is the only multiple land use wildlife area in Tanzania in which the consumptive utilization of wildlife is not permitted. Both TANAPA and NCAA are parastatal – public organizations, but not directly run by the government; all revenue is kept by the organizations for use in management of these areas.

The Wildlife Division has historically been responsible for the country's wildlife resources located outside the jurisdiction of the Ngorongoro Conservation Area and Tanzania National Parks. However, in response to concerns over questionable management practices and lack of adequate funding for the Wildlife Division to successfully manage wildlife resources, the **Tanzania Wildlife Management Authority** (TAWA) was established in 2014[3]. Also a parastatal organization, TAWA operates with significant autonomy and retains all revenue generated from hunting[4]. TAWA became operational in July 2016, and has since established an aggressive, proactive approach to protecting wildlife. In addition to conducting routine anti-poaching patrols, TAWA is actively building capacity with technology (e.g., GIS), relationships with local communities (e.g., intelligence-led operations), and collaborative efforts on an international scale.

TAWA is responsible for the management of 28 Game Reserves with an area of 112,564 km^2, approximately 38 Game Controlled Areas covering about 161,521 km^2, and Ramsar sites covering 249,856 km^2. There are also District Councils, local government institutions that work in collaboration with the TAWA. These councils oversee wildlife conservation issues and facilitate the establishment and management of Wildlife Management Areas (WMAs) on village lands.

WMAs were established as a new category of wildlife conservation areas consisting of settled and unsettled lands outside PAs, with the goal of allowing for rural communities and private landholders to manage wildlife on their land for their own benefit, shifting wildlife such as lions from a liability to an asset. The framework for WMAs was outlined in Tanzania's Wildlife Policy of 1998 (revised in 2007), with legislation established under the Wildlife Management Areas Regulations of 2002, authorizing the formal establishment of WMAs. From 2010 to 2014, over 1.3 million USD from hunting fees were disbursed to WMAs (TAWA, 2016). In 2012, Tanzania amended its Wildlife Management Area Regulations to provide a new basis for strengthening the links between local communities and wildlife management by addressing the issues of benefit sharing and control over concession allocations. Under the new regulations, the WMAs receive approximately 60-65% of the total hunting revenue occurring within the block. Additionally, WMAs gained the power to sign utilization contracts with the private sector, enabling seven WMAs to sign contracts with hunting operations worth more than 4.3 million USD (TAWA, 2016). The establishment of these WMAs has resulted in an additional 23,700 km^2 of Tanzania's land area being added to its conservation network and increased capacity for protected area management through the training of village game scouts and WMA managers.

The tourism industry, largely wildlife-based, contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates

[3] Prior to the establishment of TAWA, funding to the Wildlife Division was paid by the central treasury; inadequate funding left the Wildlife Division unable to effectively manage and protect Tanzania's wildlife resources.
[4] The mandate to collect and retain revenue from trophy hunting is enshrined in "The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order 2014.

almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations. The three parastatal organizations, TANAPA, NCAA and TAWA, retain 100% of their revenue share. Both TANAPA and NCAA are generally self-sustaining; consequently, National Parks and equivalent areas such as Ngorongoro Conservation Area, with an area covering approximately 38% of all PAs in Tanzania, are adequately funded. The sustainable utilization of resources (i.e., hunting) accounts for 70% of TAWA revenue; therefore, the viability of TAWA will depend, in part, on sufficient revenue from safari hunting. In 2012/2013, the Government of Tanzania re-established the Selous Game Reserve Revenue Retention Scheme, whereby 50% of the revenue generated from photographic tourism and tourist safari hunting is retained in order to meet management and enforcement costs in the Selous Game Reserve, one of the largest protected areas in Africa. Again, the viability of the Selous will depend, in part, on sufficient revenue from safari hunting.

Tanazania is a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Tanzania provided a copy of their CITES non-detriment finding (NDF) for lions, which finds that the export of the species will not be detrimental to the survival of the species in the wild.

Tanzania is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. As required of a member state, Tanzania has established management programs for the conservation and sustainable use of wildlife.

V. Status of Lions in Tanzania:

Approximately 40% of all lions in Africa are found in Tanzania (Riggio et al., 2013). The lion range in Tanzania covers over 90% of land (Mesochina et al., 2010), with four main subpopulations:

1. the Maasailand Ecosystem, which encompasses the Mara, Arusha Kilimanjaro and Manyara Regions of northeastern Tanzania;
2. the Kagera and Kigoma Regions of northwestern Tanzania;
3. the Rukwa, Tabora and Mbeya Regions of central and western Tanzania;
4. Selous Ecosystem, which encompasses the Lindi, Morogoro and Ruvuma Regions of southern Tanzania.

TAWIRI presents Tanzania's latest lion population estimates as 16,800 individuals (Mesochina et al., 2010), and 17,564 (12,208-19,320) (Ikanda & Packer, 2006). They estimate that 13,600 (or 81%) of these lions occurred within PAs and approximately 3,200 (or 19%) individuals occurred outside PAs. According to Riggio et al. (2013) and Björklund (2003), the minimum number of lions estimated to categorize an area as a lion stronghold is 500 individuals. The estimated population size of the four main lion ecosystems was 3,700 in the Maasailand Ecosystem, 520 in Kagera and Kigoma Regions, 2,300 in Rukwa, Tabora and Mbeya Regions, and 7,200 in the Selous Ecosystem.

Trend analysis of the lion population in Tanzania is limited due to the sporadic nature and variable methodology of past surveys, as well as the difficulty of obtaining precise lion counts (Brink, Smith, & Skinner, 2013; Funston et al., 2010), but it is suggested that, nationally, far fewer lions exist today than did 50 years ago (Ikanda, 2008). Available information suggests that this may be spatially variable, e.g., declining populations in Katavi and Tarangire (Bauer et al., 2015) and stable populations in the Selous Game Reserve (Packer et al., 2011).

VI. Management of Tanzania's Lion Population

In recognition of the role that Tanzania plays in the conservation of this species, a workshop was held in 2006 to assess available information and to set priorities for conservation of the lion in Tanzania. The Tanzania Lion and Leopard Conservation Action Plan (TAWIRI, 2009) provided an overview of this workshop and outlined a national strategic plan for lion conservation. Habitat loss and increased conflict with humans had been identified as the major threat to the species. The Tanzania Lion and Leopard Conservation Action Plan (Plan) concluded that, for those lion populations existing outside National Parks, well-run trophy hunting programs could be leveraged to successfully manage and conserve lions against these threats. To that point, the majority of permanent lion range in Tanzania lies within protected areas, 61% of which are designated as hunting areas (Mesochina et al., 2010).

A. Hunting:

Hunting of lions is allowed across much of Tanzania. Safari hunting occurs in areas known as hunting blocks, designated in Game Reserves, Game Controlled Areas, Open Areas, Forest Reserves and WMAs. Until recently, blocks were allocated using an administrative process. The government would invite hunting companies to apply to operate a hunting block; interested hunting companies were evaluated by the Hunting Block Advisory Committee. Hunting companies were allocated blocks for a period of five years, with a reporting requirement on the third year to determine compliance under the terms outlined within the hunting block regulations (TAWA, 2016). However, in 2017, it was announced that the block allocation process would be amended to introduce an auction system.

Wildlife hunting in Tanzania is based on hunting regulations set forth in Tourist Hunting Regulations No. 306 (2002). The regulations specify the fees for hunting different species, and further specify a minimum number of hunting days. Hunters are required to purchase a minimum 21-day safari in order to request a permit for the harvest of lions, as well as other specified animals (e.g., elephant, leopard). Hunters must pay a number of different fees for permits and licenses to be granted harvest authorization. The game fee to hunt a lion is the second highest game fee in Tanzania, second only to elephants.

A quota system historically was the primary method of regulating trophy hunting in Tanzania. Annual harvest quotas have been lowered over the past decade, from 520 in 2008-2009 (Lindsey et al., 2013) to 315 in recent years (TAWA, 2016). In 2016, the annual quota was further reduced to 200 individuals (TAWA, 2016). An annual quota of 200 individuals is well within the suggested sustainable 1 lion/2000 km^2 harvest rate identified by Packer et al. (Packer et al., 2011), and 25% below the sustainable harvest level suggested by TAWIRI (TAWA, 2016). However, the Plan noted the lack of scientific justification underlying that system. Furthermore, a quota system is reliant on

accurate population estimates, a near impossibility with lions. A model that simulated the dynamics of populations as a function of both quota size and age at harvest showed that there is almost no negative affect on population size when hunting is restricted to males six years or older (Whitman, Starfield, Quadling, & Packer, 2007). Restricting lion hunting by age would reduce the reliance on population estimates – an intensive and expensive effort that does not reliably return accurate results – while minimizing the effect on a lion population. Tanzania was the first country in African lion range states to officially establish age restriction rules, prohibiting hunting lions of an age below six years (section 27(1) of the Tourist Hunting Regulations of 2015). Violations of this regulation can result in penalties for the professional hunter guiding the offending hunter, including fees and revoking of the professional hunter's license.

Although inspection of trophies are required prior to export, the fundamental difficulties of accurately estimating lion age, as well as a disregard for these regulations, can result in the take of lions younger than six years. Tanzania has consequently maintained a quota system, set by hunting block according to the lions harvested during the previous hunting season. If a trophy lion is estimated to be 4-6 years, the hunter/client may export that lion, but the quota for the hunting block where the trophy was taken is reduced for the following hunting season. If a trophy is taken below the age of 4, there is a reduction of the hunting block's quota of harvestable lions by 2 and potential cancellation of the hunter's license along with other penalties such as the trophy not being eligible for export. If the trophy meets the criteria of 6 years of age or older, the hunting block's quota remains unchanged for the following hunting season. According to MNRT, these regulations have been in place since the 2012/2013 hunting season. For each trophy harvested, a compulsory hunter evaluation form, photos along with presentation of lion skull to officials for inspection and measurements, including tooth x-rays, are necessary prior to the issuance of an export permit (MNRT, 2015; TAWA, 2016).

B. Human-Lion Conflict:

It is difficult to estimate how many lions are killed illegally each year; however, retaliatory killings may be as high as 200 individuals annually (TAWA, 2016). Lions are provided protection from illegal or retaliatory killing under the Fourth Schedule due in part to human/livestock-conflict under the Dangerous Animals Damage Consolation (Government Notice No. 146) of 2011; unauthorized personnel are not permitted to kill a conflict lion unless under exceptional circumstances. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

VII. Evaluation:

In evaluating whether the importation of Mr. Destruel's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our permit issuance criteria, we examined how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We considered whether the management program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We evaluated government incentives designed to increased habitat protection for lions by private

landowners and communities, and incentives provided to local communities designed to lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions. We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. As such, we examined if the trophy hunting provides financial/resource assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how a U.S. hunter's, in this case, Mr. Destruel's, participation in the hunting program contributes to the overall management of lions within the country.

As stated earlier, the Service has evaluated this application in accordance with our regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine for this application that the import of the wild lion trophy animal would enhance the propagation or survival of the species in the wild and qualifies for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the proposed activity in this permit application (import of a trophy hunted lion from Tanzania) has demonstrated the ability to contribute towards positive conservation outcomes that mitigate or improve the status of lions throughout their range while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion that collectively contribute towards continued population declines.

Tanzania faces a growing human population, and a subsequent development of land and increasing rates of human-wildlife interactions. Protection of suitable habitat for both the lion and its prey is essential for the survival of the lion, as well as developing and sustaining the local communities' support for such policies. Wildlife protected areas, in various forms, cover about 40% of Tanzania's land area, and safari hunting has created a financial incentive to maintain these protected areas as a land use. Both the consumptive and non-consumptive utilization of wildlife resources contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations.

The companies awarded a hunting block are in a key position to conserve this land for wildlife, and are annually evaluated by the Tanzania government on several criteria, including the maintenance of prey populations, contributions/provision of benefits to the local villages, improvement to infrastructure, protection of the environment, and anti-poaching operations.

Mr. Destruel hunted with professional hunter Gamshad Gamdust of African Buffalo Safari Trackers. This company has developed several programs by which to address the main threats to lion populations.

- African Buffalo Safari Trackers maintains significant anti-poaching efforts throughout the year to protect against potential threats to habitat loss and the loss of game. The anti-poaching unit includes a head that has the authority to arrest, 10 local game scouts, 12 trackers, and 10 company anti-poaching scouts. The company has established a network of informants in the villages that are offered a reward for both poacher arrest leads and poacher conviction. The company invests a significant amount of resources into anti-poaching activities, including funding their own anti-poaching teams, contributing to government anti-poaching operations occurring in areas surrounding their holdings, and providing 3 tracking vehicles, 3 tractors, 6 tents, and a truck for patrols. The successes of these anti-poaching activities from 2015-2017 include 35 poachers arrested, 32 additional poaching incidents discovered, 16 poachers convicted, 21 firearms confiscated, and 75 bicycles confiscated.
- The concessions maintain a dense prey base for lion species that currently have a stable 3-year trend and are monitored by the anti-poaching unit.
- The company maintains the country's regulations that indicate that any taken lion must be a minimum of 6 years of age, identified by the 4 professional hunters that work for African Buffalo Safari Trackers

It has been stated that upwards of 200 lions are killed annually due to preemptive strikes or as retaliatory actions after some form of direct loss is experienced by an individual or community (TAWA, 2016). In the Ruaha communities surrounding hunting blocks and the Ruaha National Park, researchers reported 35 large carnivores were killed over an 18-month period. Similarly, Lichtenfeld et al. (2015) reported that in 12 communities of the Maasai Steppe region, more than 50 attacks by large carnivores on livestock resulted in retaliatory killing of 72-84 lions. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

As described above, we have determined that the government of Tanzania and African Buffalo Safari Trackers contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Tanzania. Further, the fees garnered through Mr. Destruel's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:</u>

A myriad of issues and factors, largely related to an increasing human population, complicate and put at risk the management of Tanzania's wildlife (Kideghesho, Rija, Mwamende, & Selemani,

2013). It is likely that the lion populations that exist outside of protected areas will continue to decline (Riggio et al., 2013), making the existence of these protected areas all the more important. The trophy-hunting program in Tanzania provides a revenue source necessary to maintain and manage protected areas from encroachment or elimination.

It is a widely supported belief that increasing the benefits for those who live with and bear costs of wildlife damage or injury by wildlife can increase tolerance of wildlife, especially of large carnivores (e.g. lions) (Bencin, Kioko, & Kiffner, 2016; Lindsey et al., 2013; Winterbach, Winterbach, Somers, & Hayward, 2012). Mr. Destruel hunted with African Buffalo Safari Trackers, which, as outlined below, will provide an indirect benefit to the lion population by generating revenue to help support and maintain a hunting block where lions are found. African Buffalo Safari Trackers is required by Tanzanian law to pay directly a USD 5,000 community development fee to the villages in the hunting area. The company has contributed significantly more than the base requirement, aiming to develop and maintain a strong relationship with these villages. These contributions have paid school fees, health facilities, classroom buildings, water infrastructure improvements, and have contributed to other construction materials. In addition to direct financial assistance, the company also employs approximately 60 villagers in permanent positions and an additional 30 with short-term positions during the off-season. The Service is further encouraged by the recent action taken by the MNRT to amend the WMA regulations enabling these communities to receive a greater proportion of revenues returned on wildlife uses.

Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

The government of Tanzania has implemented a number of policies and regulations to monitor and control the harvest of lions in the country. Therefore, the issuance of an import permit for a lion legally hunted in Tanzania does not conflict with any programs intended to enhance the survival probably of the species in Tanzania.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, almost 40% of all remaining lions are found in Tanzania. The lions located within protected areas are under the legal authority of MNRT, as well as subjected to direct management activities by hunting companies. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the maintenance of these protected areas by hunting companies is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. The cost of operating a hunting block is considerable, and lion safaris are a large source of revenue for hunting companies. This revenue is, in part, what allows the company to first and foremost maintain a presence in this protected area, and subsequently maintain an anti-poaching program, and to aid in local community development, all factors which reduce the threats faced by lions.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt associated with Mr. Destruel's application contributes to reducing the threat of extinction of lions in Tanzania. The utilization of hunters such as Mr. Destruel in supporting the safari hunting industry is an important element of the success of lion management in Tanzania.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduce the threat of extinction facing lions in Tanzania.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that legal and sustainable harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

The long-term survival of lions in Tanzania is tied directly to the success, both ecologically and economically, of the protected areas. Based on our understanding of the hunting block allocation and management, companies must submit annual reports that address several criteria, including the maintenance of key prey populations, contributions to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

Therefore, based on the information available to the Service, the applicant hunted on a hunting block with an operator that carries out their management practices in accordance with national regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

VIII. Conclusion

As stated earlier, this application received by the Service for the import of a sport-hunted trophy lion from Tanzania has been evaluated on an individual basis. The major threat facing lions today

is the loss of habitat to humans, and the subsequent consequences of living among humans (e.g., decrease of prey base due to bush-meat consumption, increase in human-lion conflict). The occupation and maintenance of hunting areas by hunting concessions -- an industry supported by U.S. hunters such as Mr. Destruel -- protects lion and prey habitat through legal hunting by preventing conversion of such land to other uses, thereby contributing to the enhancement of this species. In addition, the financial benefits to local communities generated from lion safari hunting creates incentives for protection of lions, resulting in fewer lions lost as a result of human-lion conflict, which further contributes to enhancement of this species. Given the status of lions in Tanzania and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant hunted on a hunting block where lions are actively managed in a manner that mimics natural processes. The applicant attests in the application that the hunt occurred on a properly licensed hunting block, and this finding is contingent on the hunting block where the lion was taken, having been properly licensed and fully in compliance with national and local regulations.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of the sport-hunted trophy of this wild lion will enhance the propagation or survival of the species in the wild. Therefore, the Service **is able to authorize the import of one male trophy lion taken from the wild in Tanzania, to Mathieu K. Destruel, Santa Ana, California.**

HEATHER HARCUM
Digitally signed by HEATHER HARCUM
Date: 2020.04.06 09:40:47 -04'00'

Heather Harcum, Biologist
Branch of Permits
Division of Management Authority

MARY COGLIANO
Digitally signed by MARY COGLIANO
Date: 2020.04.17 22:16:38 -04'00'

Mary Cogliano, Ph.D., Chief
Branch of Permits
Division of Management Authority

References

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L. T. B., . . . Packer, C. (2015). Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. *Proceedings of the National Academy of Sciences of the United States of America, 112*(48).

Bencin, H., Kioko, J., & Kiffner, C. (2016). Local people's perceptions of wildlife species in two distinct landscapes of northern Tanzania. *Journal for Nature Conservation, 34*, 82-92.

Björklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (*Panthera leo*). *Conservation Genetics, 4*(4).

Brink, H., Smith, R. J., & Skinner, K. (2013). Methods for lion monitoring: A comparison from the Selous game reserve, Tanzania. *African Journal of Ecology, 51*(2).

Funston, P. J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A., Macdonald, D. M., . . . Ferreira, S. M. (2010). Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology, 281*(1), 56-65.

Ikanda, D. K., & Packer, C. (2006). *Lion abundance and distribution in Tanzania - A status report to the Wildlife Division.* Unpublished manuscript.

Ikanda, D. K. (2008). *Non-detriment report under CITES regarding the export of African lions (Panthera leo) from the United Republic of Tanzania.* NDF Workshop Case Studies, WG5 - Case study, 20 pages.

IUCN SSC. (2012). *IUCN SSC guiding principles on trophy hunting as a tool for creating conservation incentives. ver. 1.0.* IUCN, Gland.

Kideghesho, J., Rija, A., Mwamende, K., & Selemani, I. (2013). Emerging issues and challenges in conservation of biodiversity in the rangelands of Tanzania. *Nature Conservation, 6*(18), 1-29.

Lichtenfeld, L., Trout, C., & Kisimir, E. (2015). Evidence-based conservation: Predator-proof bomas protect livestock and lions. *Biodiversity and Conservation, 24*(3), 483-491.

Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., . . . Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PLoS One, 8*(9).

Mesochina, P., Mbangwa, O., Chardonnet, P., Mosha, R., Mtui, B., Drouet, N., . . . Kissui, B. (2010). *Conservation status of the lion (Panthera leo linnaeus, 1758) in Tanzania.* Paris.

MNRT. (2015). *Comment on ESA status review of African lions, January 27, 2015*. Ministry of Natural Resources and Tourism, Dar es Salaam.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H., & Caro, T. (2011). Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology, 25*(1).

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., . . . Pimm, S. (2013). The size of savannah Africa: A lion's (*Panthera leo*) view. *Biodiversity and Conservation, 22*(1).

TAWA. (2016). *Non-detriment findings on African lion (Panthera leo) in the United Republic of Tanzania, including enhancement findings*. Tanzania Wildlife Management Authority, Tanzania.

TAWIRI. (2009). *Tanzania carnivore conservation action plan*. TAWIRI, Arusha, Tanzania.

Whitman, K. L., Starfield, A. M., Quadling, H., & Packer, C. (2007). Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions. *Conservation Biology.*

Winterbach, H. E. K., Winterbach, C. W., Somers, M. J., & Hayward, M. W. (2012). Key factors and related principles in the conservation of large African carnivores. *Mammal Review, 43*, 89-110.

WTTC. (2017). *Travel and tourism. Economic impact 2017: Tanzania*. World Travel & Tourism Council, United Kingdom.

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Heather Harcum Date: 04/06/2020

Telephone Number: 703-358-2104

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)
Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, **Mathieu K. Destruel** (PRT # 07512D) has requested a permit to import a trophy of one lion that he lawfully hunted in Tanzania. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Tanzania on the date specified in the permit application. The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Tanzania. The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Tanzania. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

	Determination
No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.**	**X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

MARY COGLIANO

Digitally signed by MARY COGLIANO
Date: 2020.04.17 22:20:03 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature:_____ Date: _____

LION TANZANIA ESA TROPHY

Permit Number: MA07512D-0

Effective: 04/06/2020 Expires: 04/05/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

MARY COGLIANO

Digitally signed by MARY COGLIANO
Date: 2020.04.17 22:21:40 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

RUEL
(b)(6)
SANTA RUSA, CA 95401
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12.

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Tanzania.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Import Permit for Sport-hunted Lion from Tanzania

Harcum, Heather L <heather_harcum@fws.gov>

Mon 4/20/2020 2:28 PM

To: Kevin Destruel (b)(6)

2 attachments (254 KB)

WGEN Conditions.pdf; 20-04-06_07512D_Final.pdf;

Good a. ernoon Mr. Destruel,

An import permit for your sport-hunted lion trophy (MA07512D-0) has been **issued**. You can find the permit as an attachment to this e-mail along with general perming c ondions f or wildlife specimens.

Please let me know if you have any quesons or c oncerns.

Best regards,

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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September 11, 2018

RCVD SEP 13 20

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import Application of Zambia Lion Trophy for Derek Yancey

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zambia for Derek Yancey. Also attached to the permit application is the 2018 Operator Enhancement repot from Lumimbia Mwanya-MVU Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Derek Yancey's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: DEREK L YANCEY

Date: 8/22/18

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 13 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form Zambia Lion

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
YANCEY	DEREK	LeRoy	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Windsor	Colorado	80550	Larimer	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6) 08/22/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John J. Jackson III, Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

ZAMBIA, MWANYA GMA, MFUWE

   b. Date wildlife is to be hunted:

SEPTEMBER 1-22, 2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

MVU SAFARIS LTD
PLOT 2419
FREEDOMWAY,SOUTH END

PO BOX 35225
LUSAKA, ZAMBIA

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

N/A

   b. Date wildlife was hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Not yet issued.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	SANDO SINKALA SANDO.SINKALA@ZA.STEINWEG.COM
Business Name:	BRIDGE SHIPPING ZAMBIA LIMITED
Address:	VILLA PARK, PLOT 177/178 UNIT C3 LUANSHYA ROAD
City:	LUSAKA
State/Province:	
Country, Postal Code:	ZAMBIA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

See data funded by Zambia Authorities.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

See operator report attached.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

See operator report attached.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b)(6) _____ Date: 8/2/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: **LUMIMBA MWANYA-MVU SAFARIS**

   a. Years in business: **EIGHT YEARS YEARS**

   b. Name of company conducting hunt: **MVU SAFARIS**

   2. Name of concession: **LUMIMBA MWANYA GMA** Size in km²: **1603 KM2**

   a. Land tenure: __ Government lease _x_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: **SEVEN YEARS** Can it be renewed? **X** Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **NEAREST TOWN IS MFUWE**

   e. If the concession borders a national park, please provide the park name: **SOUTH LUANGWA NATIONAL PARK**

   f. Description of general and distinctive habitat features and any water features: **HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS AND LAGOONS THE LUANGWA RIVER FLOWS THROUGH THE GMA**

3. Are there any communities living in the concession? **X** Yes __ No

   a. If so, estimated number of people or villages in the concession? **ABOUT 400 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? **X** Yes __ No

   a. If so, estimated number of people or villages around the concession? **THE POPULATION IS SPARSE AROUND THE GMA**

5. Relevant game populations in the concession:[1]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**ABUNDANT**	**600 AND ABOVE**	**UPWARD**	**PATROL DATA AND OBSERVATIONS**
Lion	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Leopard	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Prey species	**ABUNDANT PREY BASE**	**ABUNDANT**	**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**

6. Total employment number: **__20 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS_____**

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	EIGHTEEN	EIGHTEEN
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	18	18	THROUGH OUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	20	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **TWELVE**

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**

   c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**

   d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS**

   e. Description of anti-poaching equipment, vehicles, etc.: **TWO 4X4 LANDCRUISERS, SATELLITE PHONES AND FIREARMS**

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**

   g. Do you offer rewards to poaching informants leading to arrest? **X** Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? **X** Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	140 800	140,800	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	50,000	43,000	50,000	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000			USED TO BUY A LANCRUISER IN THE FIRST YEAR DONATED TO DNPWS

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	38,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _____				
Other: _____				
TOTALS	**660,400**	**246,900**	**309,900**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	201	115	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	8	2	3	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	81	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	5	0	1	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	558	402	289	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	27	19	7	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **WE PAY 170,000 KWACHA AS COMMUNITY OBLIGATION AND 90,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES**

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **The meat contribution program: 50% OF EADIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	13,000	33,700	41,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **_ZAMBIAN KWACHA__**

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		90,000	135,000	Most of the schools in this Area are in a deplorable state. MVU safaris has embarked on a program

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

				to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS		**90,000**	**135,000**	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	2(40%)	8 (60%)	10(62%)
-- hunting lion	0	2	2
-- hunting elephant	0	2	2
-- hunting leopard	3	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: **50%**

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

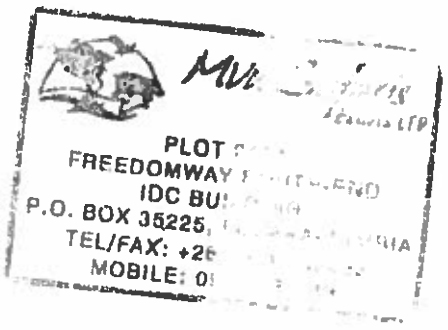
-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:

Name: MUHAMMAD SAEED ESSA **Title: DIRECTOR**



MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.coml

I. DESCRIPTION OF COMPANY AND CONCESSION

Mvu Safaris, Ltd. has been operating in Mwanya Concession since April 2015. The concession provides habitat for a range of species including Lion, Leopard, Buffalo, Elephant, Hippo, Crocodile, Cookson Wildebeest and Plains Game. The concession is in Eastern Province of Zambia and shares boundaries with three national parks on the west side, northern side and southern side. The area is classified as prime hunting area. Mvu Safaris has entered into a seven year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system. Lumimba Mwanya is about 1603Km Squared.

Our company is a Limited Company whose Directors are Mr. Mohammed Saeed Essa and Mr. Gulam Adam Patel. The Company has been operating in this country for 6 years although this concession was acquired in April 2015. In view of this Mvu Safaris maintains two Hunting Concessions which is Mufunta and Mwanya. Mvu Safaris has one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, twelve anti-poaching scouts, and eight camp staff (cooks, cleaning, miscellaneous). There are about Twenty two Families that are direct beneficiaries from Mvu Safaris employees. These beneficiaries come from the local community.

The Resident Professional Hunter comes from the nearest town called Chipata. We can approximate that more than 200 people benefit from our operations because most of these employees have more than one wife and have a number of dependents who depend on them for survival. We very much appreciate the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy school necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from hunting of Lion and Leopard. With this in mind Mvu Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti –poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mvu Safaris maintains six groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

In 2017, Mvu Safaris spent almost $30900 in Mwanya on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 450 liters of diesel for patrol vehicles. We recorded 228 patrol days and well above 1600 patrol hours. We also paid over $3850 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5,900	Directly paid and some subsidies to WA
Scout equipment	5,000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	6,300	For scouts and WA
Rations for WA and community scouts	9,850	
Rewards	3,850	For information and arrests
TOTAL	$30,900	

The concession agreement has a clause which requires Mvu Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2021 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $30900 annually as per agreement which was entered in 2015 by Mvu Safaris, the Community and the Wildlife Authorities. In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. In 2017 we distributed more than 50% to the community.

In the picture above firearms and snares recovered from poachers and surrendered to the Department of National Parks

In the picture above. Elephant Tusks recovered by the Department of National Parks from Poachers in the Luangwa Valley where Mwanya GMA is situated together with surrounding blocks in the Luangwa Valley.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers. In 2017; 3,250 dollars was set aside for compensation purposes in case of such occurrences. We did not have many occurrences of problem animals and just part of the USD 3250 was used for compensation purposes.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $500 to maintain in 2017 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource.

The concession is along the Luangwa River with its smaller streams flowing through the concession creating more water availability for animals. As a result we have a lot of Game in our concession which attracts Lion and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mvu Safaris in Mwanya is still monitoring the population growth of the Lion and Leopard which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mvu Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by positioning cameras in strategic areas so as to monitor the Activities of the Lion and Leopard. Even though our area is rated as a prime area we will work extra hard to grow the population of the Species by at least 15% per year. This will be done by introducing a deliberate approach where only old animals will be harvested for trophies and work on very careful allocated quota utilization per year in the block.

We will also engage the wildlife authorities to regulate resident Hunting by proposing that animals hunted for food purposes should be female so as to balance the Eco system. We further wish to propose that resident hunting should be closely monitored and supervised because we have had reports in the past where resident hunters would not conduct proper ethical hunting methods in the hunting concession where they get allocated hunting rights per year for their own personal hunting opportunities as residents of Zambia and we wish to bring this anomaly to an end.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lion in our area better. As at now we use Lion tracks and foot prints. Sightings by individuals and the cameras which we use annually to monitor the size and age for the Lion.

C. Elephant Hunting

Mvu Safaris does not only limit its Sustainable-Hunting based approach to cats only. We are aware that Elephant is also a high Value Hunting Safari. Recognizing this fact we at Mvu Safaris have a policy which is in line with the wildlife Authorities of not taking Elephant whose tusks is weighing below 15kilograms.

D. Lion Aging Approach

We have been following an age-based policy for African Lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities.

Our approach as a company from 2015 until 2021 when our concession will be due for renewal is to hunt lion which has reached an advanced and mature age only of minimum 5 years and above.

E. U.S. Hunters

Our Largest clientele is from the United States of America. We are happy to report that we have had very good relations with most of these clients who are willing to get out of their way and spend extra in terms of donations to communities and towards Anti-poaching programs. Their approach to Safari Hunting has been that of maintaining high ethics of sustainability so as to improve the numbers of species in these concessions.

CONCLUSION

Mvu Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion/Leopard. Our program helps to preserve and improve available Lion/Leopard habitat. Our anti-poaching program serves to protect and grow the cats prey base and reduces incidental off take by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially Lion) to local communities. Mvu Safaris does not limit is Sustainable use based hunting approach to Cats only but includes other species which are of high value including the African Elephant.Mvu Safaris has anti-poaching awareness campaign programs also which are done through funding sporting activities. This has helped improve the awareness on poaching in the community and how poaching robes them of the much needed finances generated from these natural resources. We can confirm that the communities in our concession are fully aware of the benefits that Safari Hunting comes along with and the dangers that are posed to this resource if poaching is left to escalate at higher levels. The community is now more than willing to bring to our attention any suspicious activities by some members of the communities.

Signed: _____

Operator Name: MUHAMMAD SAEED ESSA

Title: DIRECTOR

Harcum, Heather <heather_harcum@fws.gov>

[EXTERNAL] PRT No.: 07865D (Derek Yancey - Lion - Zambia)

2 messages

Tammy Piker <permits@conservationforce.org> Mon, Jan 20, 2020 at 1:21 PM
To: heather_harcum@fws.gov

Good afternoon Heather - In connection with the referenced PRT number, would you be so kind as to check on the status of the application and let me know if it is simply pending, or is there some information needed by the FWS to complete the application? I have been contacted by our client and before sending an answer to him, Mr. Jackson has suggested that I check with your office. If there is another person at FWS that I should be directing this email to, please advise and I will re-route it to that person. Since this is day 1 of week 2, I still feel a little 'lost' regarding to whom I should send inquiries. Thank you for your assistant - it is greatly appreciated.

Tammy L. Piker

Conservation Permitting Division
CONSERVATION FORCE
P.O. Box 278
Metairie, LA 70004-02781
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

Harcum, Heather <heather_harcum@fws.gov> Tue, Jan 21, 2020 at 6:25 AM
To: Tammy Piker <permits@conservationforce.org>

Good morning Tammy,

Thank you for your inquiry. Our records show that our office reached out on May 22, 2019 requesting the applicant's license(s)/permit(s) authorizing the lion hunt un Zambia (see attached e-mail). Please contact the biologist working on the review of this permit, Darcy Vargas (darcy_vargas@fws.gov), to provide this information from the applicant.

Thank you,
Heather Harcum
[Quoted text hidden]
--

Heather Harcum | Permits Biologist
USFWS | International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
Phone 703-358-2350 | Fax 703-358-2115

www.CITES.org

2019-05-22_07865D_EmailApp.pdf
78K

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 07865D / Import of Zambia Lion / Derek Yancey

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 3:15 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Mr. Jackson,

Ref: 07865D; Import of Mr. Derek LeRoy Yancey's lion trophy import, from Mwanya GMA, Lusaka Zambia, to be taken from September 1-22, 2019.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide a copy of the Zambia licenses/permits authorizing Mr. Yancey's lion hunt.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Abandonment of Application # 07865D

Vargas, Darcy <darcy_vargas@fws.gov>

Wed 2/19/2020 6:08 PM

To: cf@conservationforce.org <cf@conservationforce.org>

1 attachments (56 KB)

2020-02-19_07865D_Final_ABN_LTR.pdf;

Dear Mr. Jackson,

Ref: Abandonment of Application # 07865D

Please find the enclosed letter that was mailed to the applicant today. The referenced file has been administratively closed.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

February 19, 2020

Derek LeRoy Yancey
(b)(6) [redacted]
Windsor, CO 80550

Dear Mr. Yancey:

On May 22, 2019, an email was sent to your application contact, John Jackson with Conservation Force, requesting additional information in regard to your application PRT- 07865D. In that email, he was informed that you needed to respond to the request by June 6, 2019 [45 calendar days after May 22, 2019], or your application would be abandoned. Since we have not received the requested information, we have abandoned your application, and your application has been administratively closed.

If, in the future, you wish to pursue the activity for which you originally applied, you will need to submit a new application, along with any appropriate fees, to this office. Please be aware that in most cases, we will not "transfer" information from your old application to a new application. All relevant information would need to be supplied at the time a new application is submitted.

If we can be of assistance, you may contact our office at 703-358-2104 or fax 703-358-2281.

Sincerely,

Permit Biologist
Division of Management Authority

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 07865D / Import of Zambia Lion / Derek Yancey

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 3:15 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Mr. Jackson,

Ref: 07865D; Import of Mr. Derek LeRoy Yancey's lion trophy import, from Mwanya GMA, Lusaka Zambia, to be taken from September 1-22, 2019.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide a copy of the Zambia licenses/permits authorizing Mr. Yancey's lion hunt.

In accordance with 50 CFR 13.11(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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A FORCE FOR WILDLIFE CONSERVATION

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September 11, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD SEP 13 2018

RE: Import Application of Zambia Lion Trophy for Joseph Dement

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zambia for Joseph Dement. Also attached to the permit application is the 2018 Operator Enhancement repot from Lumimbia Mwanya-MVU Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Joseph Dement's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD SEP 13 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted **Lion; Panthera leo** trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: **JOSEPH DAVID DEMENT**

Date: **August 13, 2018**

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 13 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
DEMENT	JOSEPH	DAVID	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
OAKFIELD	TN	38362	MADISON	USA

(b) (6) erent than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
MEDINA	TN	38355	GIBSON	USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ac derstand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

08/13/2018

Signature o otocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lion; Panthera leo

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Country - Zambia; Area - Lumimba Mwanya GMA; Region - Eastern Province of Zambia;
Nearest Town - Mfuwe; Nearest City - Chipata

   b. Date wildlife is to be hunted:

Lion (Panthera leo) hunted in the 2018 hunting season on Lumimba Mwanya GMA in the Eastern Province of Zambia; Scheduled Hunt Dates are October 14 - November 4, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Name of Hunting Outfitter/Safari Company - MVU Safaris, LTD.
Name of Professional Hunter - WH van Noordwyk

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). **Lion, Panthera leo, has not been hunted yet and do not currently hold any such permits or licenses, as of the date of this application being submitted.**
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
   Name: Sando Sinkala; Telephone: +260 211 847 881 Email: sando.sinkala@za.steinweg.com
   Business Name: Bridge Shipping Zambia LTD
   Address: Villa Park; Plot 177/178; Unit C3; Luanchya Road
   City: Lusaka
   State/Province: Zambia
   Country, Postal Code: 10101
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?
   The area consists of healthy volumes of pride and single males to the extent that the area has successfully harvested 2 mature lion males the past three seasons which made the age limit in Zambia easily, as per the Zambia's law. It is difficult to accumulate exact numbers on c due to their nocturnal lifestyle and and being all over the place covering a vast territory. The area is bordered and situated against the Sou Luangwa National Park, Luambe Park, and Lukusuzi Park which means the hunting block is covered on three sides by National Parks. Lic roam freely between the parks and hunting block making it extremely difficult. However, as an area that is able to successfully harvest two mature males per year, it has a very healthy mature population.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

   Hunting License $900
   Lion Trophy Fee $10,000
   21 Day Lion Safari Daily Rates Total $60,000
   Concession Fee $10,000

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

   Attached to application in the Conservation Force Operator Enhancement Questionaire and the MVU Safaris, Ltd. Description of Company and Concession, Anti-Poaching Component, Community Participation, Conflict Control, Habitat Protection and Conservation Development and Other Information.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two [redacted] dar year.

    Applicant's signature: [redacted] Date: 08-13-2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Memphis, TN
3150 Tchulahoma Rd., Suite #6
Memphis, Tennessee 38118
Phone: (901) 544-3694
Fax: (901) 544-3696
fwsole_memphis@fws.gov

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: **LUMIMBA MWANYA-MVU SAFARIS**

   a. Years in business: **EIGHT YEARS YEARS**

   b. Name of company conducting hunt: **MVU SAFARIS**

   2. Name of concession: **LUMIMBA MWANYA GMA** Size in km²: **1603 KM2**

   a. Land tenure: __ Government lease _x_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: **SEVEN YEARS** Can it be renewed? **X** Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **NEAREST TOWN IS MFUWE**

   e. If the concession borders a national park, please provide the park name: **SOUTH LUANGWA NATIONAL PARK**

   f. Description of general and distinctive habitat features and any water features: **HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS AND LAGOONS THE LUANGWA RIVER FLOWS THROUGH THE GMA**

3. Are there any communities living in the concession? **X** Yes __ No

   a. If so, estimated number of people or villages in the concession? **ABOUT 400 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? **X** Yes __ No

   a. If so, estimated number of people or villages around the concession? **THE POPULATION IS SPARSE AROUND THE GMA**

5. Relevant game populations in the concession:[1]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	ABUNDANT	600 AND ABOVE	UPWARD	PATROL DATA AND OBSERVATIONS
Lion	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Leopard	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Prey species	ABUNDANT PREY BASE	ABUNDANT	UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA

6. Total employment number: __20 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS_____

a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	EIGHTEEN	EIGHTEEN
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	18	18	THROUGH OUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	20	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **TWELVE**

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**

   c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**

   d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS**

   e. Description of anti-poaching equipment, vehicles, etc.: **TWO 4X4 LANDCRUISERS, SATELLITE PHONES AND FIREARMS**

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**

   g. Do you offer rewards to poaching informants leading to arrest? **X** Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? **X** Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	140 800	140,800	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	50,000	43,000	50,000	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000			USED TO BUY A LANCRUISER IN THE FIRST YEAR DONATED TO DNPWS

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	38,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _____				
Other: _____				
TOTALS	**660,400**	**246,900**	**309,900**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	201	115	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	8	2	3	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	81	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	5	0	1	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	558	402	289	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	27	19	7	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **WE PAY 170,000 KWACHA AS COMMUNITY OBLIGATION AND 90,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES**

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **The meat contribution program: 50% OF EADIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	13,000	33,700	41,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _**ZAMBIAN KWACHA**__

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		90,000	135,000	Most of the schools in this Area are in a deplorable state. MVU safaris has embarked on a program

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

				to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS		**90,000**	**135,000**	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	2(40%)	8 (60%)	10(62%)
-- hunting lion	0	2	2
-- hunting elephant	0	2	2
-- hunting leopard	3	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: **50%**

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

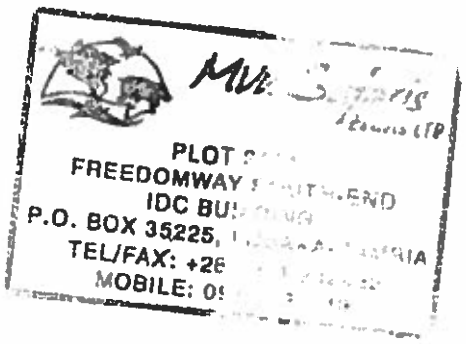
-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:

Name: MUHAMMAD SAEED ESSA **Title: DIRECTOR**



MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.coml

I. DESCRIPTION OF COMPANY AND CONCESSION

Mvu Safaris, Ltd. has been operating in Mwanya Concession since April 2015. The concession provides habitat for a range of species including Lion, Leopard, Buffalo, Elephant, Hippo, Crocodile, Cookson Wildebeest and Plains Game. The concession is in Eastern Province of Zambia and shares boundaries with three national parks on the west side, northern side and southern side. The area is classified as prime hunting area. Mvu Safaris has entered into a seven year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system. Lumimba Mwanya is about 1603Km Squared.

Our company is a Limited Company whose Directors are Mr. Mohammed Saeed Essa and Mr. Gulam Adam Patel. The Company has been operating in this country for 6 years although this concession was acquired in April 2015. In view of this Mvu Safaris maintains two Hunting Concessions which is Mufunta and Mwanya. Mvu Safaris has one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, twelve anti-poaching scouts, and eight camp staff (cooks, cleaning, miscellaneous). There are about Twenty two Families that are direct beneficiaries from Mvu Safaris employees. These beneficiaries come from the local community.

The Resident Professional Hunter comes from the nearest town called Chipata. We can approximate that more than 200 people benefit from our operations because most of these employees have more than one wife and have a number of dependents who depend on them for survival. We very much appreciate the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy school necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from hunting of Lion and Leopard. With this in mind Mvu Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti –poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mvu Safaris maintains six groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

In 2017, Mvu Safaris spent almost $30900 in Mwanya on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 450 liters of diesel for patrol vehicles. We recorded 228 patrol days and well above 1600 patrol hours. We also paid over $3850 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5,900	Directly paid and some subsidies to WA
Scout equipment	5,000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	6,300	For scouts and WA
Rations for WA and community scouts	9,850	
Rewards	3,850	For information and arrests
TOTAL	$30,900	

The concession agreement has a clause which requires Mvu Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2021 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $30900 annually as per agreement which was entered in 2015 by Mvu Safaris, the Community and the Wildlife Authorities. In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. In 2017 we distributed more than 50% to the community.

In the picture above firearms and snares recovered from poachers and surrendered to the Department of National Parks

In the picture above. Elephant Tusks recovered by the Department of National Parks from Poachers in the Luangwa Valley where Mwanya GMA is situated together with surrounding blocks in the Luangwa Valley.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers. In 2017; 3,250 dollars was set aside for compensation purposes in case of such occurrences. We did not have many occurrences of problem animals and just part of the USD 3250 was used for compensation purposes.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $500 to maintain in 2017 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource.

The concession is along the Luangwa River with its smaller streams flowing through the concession creating more water availability for animals. As a result we have a lot of Game in our concession which attracts Lion and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mvu Safaris in Mwanya is still monitoring the population growth of the Lion and Leopard which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mvu Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by positioning cameras in strategic areas so as to monitor the Activities of the Lion and Leopard. Even though our area is rated as a prime area we will work extra hard to grow the population of the Species by at least 15% per year. This will be done by introducing a deliberate approach where only old animals will be harvested for trophies and work on very careful allocated quota utilization per year in the block.

We will also engage the wildlife authorities to regulate resident Hunting by proposing that animals hunted for food purposes should be female so as to balance the Eco system. We further wish to propose that resident hunting should be closely monitored and supervised because we have had reports in the past where resident hunters would not conduct proper ethical hunting methods in the hunting concession where they get allocated hunting rights per year for their own personal hunting opportunities as residents of Zambia and we wish to bring this anomaly to an end.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lion in our area better. As at now we use Lion tracks and foot prints. Sightings by individuals and the cameras which we use annually to monitor the size and age for the Lion.

C. Elephant Hunting

Mvu Safaris does not only limit its Sustainable-Hunting based approach to cats only. We are aware that Elephant is also a high Value Hunting Safari. Recognizing this fact we at Mvu Safaris have a policy which is in line with the wildlife Authorities of not taking Elephant whose tusks is weighing below 15kilograms.

D. Lion Aging Approach

We have been following an age-based policy for African Lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities.

Our approach as a company from 2015 until 2021 when our concession will be due for renewal is to hunt lion which has reached an advanced and mature age only of minimum 5 years and above.

E. U.S. Hunters

Our Largest clientele is from the United States of America. We are happy to report that we have had very good relations with most of these clients who are willing to get out of their way and spend extra in terms of donations to communities and towards Anti-poaching programs. Their approach to Safari Hunting has been that of maintaining high ethics of sustainability so as to improve the numbers of species in these concessions.

CONCLUSION

Mvu Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion/Leopard. Our program helps to preserve and improve available Lion/Leopard habitat. Our anti-poaching program serves to protect and grow the cats prey base and reduces incidental off take by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially Lion) to local communities. Mvu Safaris does not limit is Sustainable use based hunting approach to Cats only but includes other species which are of high value including the African Elephant.Mvu Safaris has anti-poaching awareness campaign programs also which are done through funding sporting activities. This has helped improve the awareness on poaching in the community and how poaching robes them of the much needed finances generated from these natural resources. We can confirm that the communities in our concession are fully aware of the benefits that Safari Hunting comes along with and the dangers that are posed to this resource if poaching is left to escalate at higher levels. The community is now more than willing to bring to our attention any suspicious activities by some members of the communities.

Signed: _____

Operator Name: MUHAMMAD SAEED ESSA

Title: DIRECTOR

Mvu Safaris Zambia LTD
PLOT 2414
FREEDOMWAY SOUTH-END
IDC BUILDING
P.O. BOX 35225, LUSAKA-ZAMBIA
TEL/FAX: +260 211 232422
MOBILE: 0977 431148

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 08062D

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Nov 29, 2018 at 5:17 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Conservation Force,

Ref: 08062D for the import of a lion trophy taken by Joseph David Dement in Zambia.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. According to the referenced application, the lion hunt should have occurred by November 4, 2018. Therefore, please submit a copy of Mr. Dement's hunting license and all related Zambian licenses.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by January 13, 2018 (45 calendar days of the date of this letter), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 08062D

John J. Jackson, III <cf@conservationforce.org> Wed, Jan 9, 2019 at 3:03 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Please see the attached License for Joseph Dement.

Thanks

[Quoted text hidden]
--

Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145
jjj@conservationforce.org • www.conservationforce.org

dement-3-lion.pdf
2811K

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0001160

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 12/10/18 .....

DETAILS OF PERMIT HOLDER

Full name:..... Dement J. David ..... NRC/Passport No (b)(6) [redacted]

Tel/Mobile No.: (b)(6) [redacted] ..... E-mail address.....

Postal Addre[redacted] ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 887 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 470 ..... 2. ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0001368 .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lemimbs .....Game Management Area,

..... Mwanya .....Hunting block for .....days from..... 14/10/18

to..... 6/11/18 ..... (Dates inclusive)

Amount Paid..... $150 ..... GRZ Receipt No.....

....

Official Stamp

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
12 OCT 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Chairperson of the Committee

Note: *Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book*

NPW FORM 7

Original

0001363

REPUBLIC OF ZAMBIA

S/No.: .....

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 of 2015)
THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATIONS, 2007)
Regulation 5(2)
BIRD HUNTING LICENCE

Station of issue: Chulang Date of issue: 12/10/18

DETAILS OF LICENSEE

Full Name: Dement J. David NRC/Passport No: 451291531

Tel/Mobile No: ..... E-mail address: .....

Postal Address: Box 35225 Lsk Residential Address: USA

DETAILS OF FIREARM(S)

Firearm Licence No(s) 1: 887 2: ..... 3: .....

Calibre of Firearm(s) 1: 270 2: ..... 3: .....

The above named licensee is authorized to hunt birds of species specified in column 1 except during the seasons specified in column 2.

Common Name (Column 1)	Closed season (Column 2)
Fulvous Whistling Duck	1st January to 31st May
White-faced Whistling Duck	1st January to 31st May
White-Backed Duck	1st January to 31st May
Egyptian Goose	1st January to 31st October
Spur-Winged Goose	1st January to 31st May
Knob Billed Duck	1st January to 31st May
African Pygmy Goose	1st January to 31st May
African Black Duck	1st January to 31st May
Yellow-Billed Duck	1st January to 31st May
Cape Teal	1st January to 31st May
Pintail	1st January to 31st May
Red-Billed Teal	1st January to 31st May
Hottentot Teal	1st January to 31st May
Garganey	1st January to 31st May
Northern Shoveler	1st January to 31st May
Cape Shoveler	1st January to 31st May
Southern Pochard	1st January to 31st May
Coqui Francolin	1st February to 30th June
White throated Francolin	1st February to 30th June
Crested Francolin	1st February to 30th June
Shelley's Francolin	1st February to 30th June
Red-winged Francolin	1st February to 30th June
Red-billed Francolin	1st February to 30th June
Natal Francolin	1st February to 30th June
Hildebrandits Francolin	1st February to 30th June
Swaisons' Francolin	1st February to 30th June
Red-necked Francolin	1st February to 30th June
Common quail	1st October to 31st March
Harlequin Quail	1st October to 31st March
Blue Quail	1st October to 31st March
Crested Guinea fowl	1st December to 3tht April
Helmeted Guinea fowl	1st December to 3tht April

Note: A maximum of six birds to be hunted within 21 days under Non-Resident Hunting.

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND
12 OCT 2018
MUNGING
PRIVATE BAG ... LUSAKA, ZAMBIA.

Bird Hunting Licence Fees $100

Application Fees Paid -

Total Fees Paid $100

GRZ Receipt No.....

....
Official Stamp Chairperson of the Committee

Note: Original copy to Applicant - Duplicate to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the book

Original

NPW FORM 2

0002187

S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue..... Chilanga ..... Date of Issue..... 17/10/18 .....

DETAILS OF LICENSEE

Full Name..... Joseph D Dement ..... NRC No./Passport No. (b)(6) .....

Nationality..... USA ..... Age.....

Tel/Mobile No:..... E-mail.....

Full Name of Safari Company: Muu Saf .....

Certificate of Incorporation No. ..... Date of Incorporation.....

Postal Address (b)(6) ..... Residential Address.....

Firearm Licence/Tourist Firearm Import No. 887 ..... Calibre of Firearm. 470 .....

Type of Hunt..... Classic .....

Any other relevant information, which may be considered in support of this application (e.g, previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Muamya	2018	4200
			0000143		
/					

Total Animals fees paid - the kwacha equivalent of US$ 4200

Concession Fees paid - the kwacha equivalent of US$ —

Grand Total the kwacha equivalent of US$ 4200

..... Official Stamp

..... Chairperson of the Committee

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
17 OCT 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

NPW FORM 12

ORIGINAL

0000276

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: WH van Noordwyk NRC/Passport No. 998733/11/2

Residential Address: Plot 2414 Freedom Way, Lusaka.

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Muu Safaris.

DETAILS OF CLIENT

Name of client: Joseph D Dement. NRC/Passport No: (b)(6)

Tel/Mobile No..... Nationality: USA.

Postal Address..... Residential Address: (b)(6) TN, USA.

Type of Licence: Classic. Licence No.: 0001160.

Date of Issue: 12/10/18. Place of Issue: Chilanga.

Name of Hunting Block where hunting was conducted: Mwanya.

Hunting period From 14/10/18 To 6/11/18.

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
16/10/18.	Hippo.	M	1		36L 0537077 8571416	✓		
17/10/18.	Puku.	M	1		36L 0537286. 8571286.	✓		
15/10/18.	Zebra	M	1		36L 0537810 8571682	✓		
18/10/18.	Lion	M	1		36L 0537[illegible]1984 8571[illegible]4453	✓		
20/10/18.	Buffalo	M	1		36L 0537[illegible] 8573354.	✓		

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Hippo		28 3/4 inch.		
Puku		~~16 in~~	16 inch.	
Zebra.				
Lion				14 inch.
Buffalo.			41 5/8 inch.	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 29/10/18 Signature of Client.....

Date 29/10/18 Signature of Professional Hunter.....

Date 29/10/18 Name of Wildlife Police Officer GEOFFREY SAKALA

Employment No. of W.P.O. 00275814

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

NPW FORM 12

0000277

ORIGINAL

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: W.H van Noordwyk NRC/Passport No. 998733/11/2

Residential Address: Plot 2414 Freedom Way, Lusaka.

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Muu Safaris.

DETAILS OF CLIENT

Name of client: Joseph D Dement NRC/Passport No: (b)(6)

Tel/Mobile No..... Nationality: USA

Postal Address..... Residential Address: (b)(6) TN, USA

Type of Licence: Classic. Licence No.: 000 1160.

Date of Issue: 12/10/18 Place of Issue: Chilanga.

Name of Hunting Block where hunting was conducted: Mwanya

Hunting period From 14/10/18 To 6/11/18.

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
23/10/18.	Crocodile	M	1		36L 0378231 8594525	✓		
24/10/18.	Baboon	M	1		36L 0377152 8591551	✓		
25/10/18	Wildebeest	M	1		36L 0407350 8600180	✓		
25/10/18	Grysbuck	M	1		36L 0405710 8599951		✓	
28/10/18	Hyena	M	1		36L 0406430 8601845	✓		

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Crocodile	4,26 m.			
Baboon				9 inch.
Wildebeest			26 inch.	
Grysbuck.			1,5 inch.	
Hyena				12 inch.

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and tha (b)(6) above is the full amount paid by the client for the hunt.

Date 29/10/18 Signature of Client.....

Date 29/10/18 Signature of Professional Hunter.....

Date 29/10/18 Name of Wildlife Police Officer GEOFFREY SAKALA

Employment No. of W.P.O. D0245814

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

[EXTERNAL] Re: Permit application 08062D (Zambia - date of hunt?)

Joe Dement (b)(6)

Tue 4/7/2020 3:06 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>

The lion was taken on Oct. 17 2018. Any other questions please feel free to contact me. Thanks Joe Dement

Sent from my iPhone

> On Apr 7, 2020, at 11:58 AM, Brisendine, Amy <amy_brisendine@fws.gov> wrote:
>
> Hi Mr. Dement,
>
> I apologize for the delay in processing your application to import a trophy of a lion that was hunted in Zambia (application no. 08062D, received in our office on 9/13/2018. Can you please provide me with the specific date the lion was hunted/taken?
>
> Thank you and please contact me if have any questions.
>
> Best regards,
>
> Amy Brisendine
> U.S. Fish and Wildlife Service
> International Affairs, Division of Management Authority
> Branch of Permits
> 5275 Leesburg Pike, MS: IA; 2W059D
> Falls Church, Virginia 22041
> https://www.fws.gov/international/permits/
> https://www.cites.org
>
> Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

Permit application 08062D (Zambia - date of hunt?)

Brisendine, Amy <amy_brisendine@fws.gov>

Tue 4/7/2020 12:58 PM

To: cf@conservationforce.org <cf@conservationforce.org>
Cc: joe@martinpaving.net <joe@martinpaving.net>; Brisendine, Amy <amy_brisendine@fws.gov>

Hi Mr. Dement,

I apologize for the delay in processing your application to import a trophy of a lion that was hunted in Zambia (application no. 08062D, received in our office on 9/13/2018. Can you please provide me with the specific date the lion was hunted/taken?

Thank you and please contact me if have any questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Amy Brisendine Date: April 7, 2020

Telephone Number: 703-358-2005

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 08062d, Joseph David Dement, has requested a permit to import a trophy of one lion that he lawfully hunted in Zambia. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zambia on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zambia.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zambia. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.05 21:04:56 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
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May 5, 2020

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.05 21:12:49 -04'00'

Memorandum

From: Mary Cogliano

To: Permit File PRT-08062D

Enhancement Finding

Applicant: Joseph David Dement (PRT-08062D)

Summary

Joseph David Dement submitted an application to import one male African lion (*Panthera leo melanochaita*), which he hunted on October 18, 2018, from the Mwanya Game Management Area, Zambia, for the purpose of enhancing the propagation and survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion out of Zambia requires the prior issuance of a CITES export permit from the CITES Management Authority of Zambia; and import into the United States requires the prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service, therefore, may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and information received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken October 18, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

U.S. Governance of the Lion:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion (79 Fed. Reg. 64472.). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service

published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (80 Fed. Reg. 79999). The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application demonstrating that the activity meets the requirements for issuance under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in future findings for import of sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Dement 's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Mwanya Game Management Area (GMA), in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service in

making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all

relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Dement's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we review a number of factors. Some of the factors we considered in making this finding include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country.

Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives for local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. In this finding, we examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the proposed import of this trophy in accordance with the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how Mr. Dement's participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range country and interested

parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for our finding:

In February 2020, the Service received an updated "Enhancement and Non-detriment Finding for African lion Sport Hunting in Zambia" from Zambia's Department of National Parks and Wildlife (DNPW). This updated finding notes, "since the re-introduction of trophy hunting for lion in 2016, the DNPW is implementing an adaptive management strategy that limits the off-take of lions. To support this approach, it has experimented in implementing a robust age-based monitoring programme that will become binding for the 2020 hunting season." Prior to this February 2020, update, in February 2016, the Service sent a letter to Zambia's Wildlife Authority with questions about the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether the management addresses the three main threats that were identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. In the letter, the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, aids the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to this letter, Zambia's DNPW (DNPW 2016), provided documentation, dated May 5, 2017, describing Zambia's lion population and management plans.

Since 2016, the Service has met with officials from Zambia multiple times to receive updated information and clarify questions the Service has had on the status of and management of lions in Zambia with respect to imports of sport-hunted lion trophies. For example, more recently, Service representatives met with Zambian officials in February, 2020, at the annual Safari Club International Convention in Reno, Nevada; November, 2019, at the 17th African Wildlife Consultative Forum in Zimbabwe; and November 2018, at the 16th African Wildlife Consultative Forum in Uganda.

The documentation the Service received from DNPW in February, 2020, and May, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, information received from interested parties, and Mr. Dement's application are the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS), which was responsible for the protected area network. In 1999, the Government of

Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capacity, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with its law enforcement capabilities due to inadequate resources.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Zambia's vision as stated in the Strategy is to have a secure, viable, and well-managed wild population of lions that will support conservation of biodiversity in harmony with human development. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies and projects that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW 2016). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work-time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. Under DNPW, *the Wildlife Law Enforcement Unit* currently has a staff compliment of 1,525 Wildlife Police Officers covering an estimated 236,376 km^2 of wildlife estates (equivalent to approximately 155 km^2/Wildlife Police Officer) (DNPW 2020, p. 18). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under Zambia's Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition, Zambia is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including making findings by the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. Zambia has provided to us a copy of its May 5, 2016, non-detriment finding for lions, which it updated in January, 2020. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." The Scientific Authority further explained that its positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa. As of 2020, additional genetic analyses are also being conducted by Zambia Lion Project, including assessments that will help inform DNPW in future efforts to translocate lions among different

regions in Zambia in order to re-establish lion populations in historic lion range e.g., West Lunga complex.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosysteMr. Surveys were conducted in the later part of 2016 (DNPW 2016). In 2018 the Zambia Carnivore Programme (ZCP 2018) intensively monitored 15 prides and 15 coalitions totaling 173 lions across Northern and Central Kafue in 2018 extending the study area to the remote Kasonso-Busanga GMA. It is believed that the lion population in this ecosystem is stable or possibly increasing (DNPW 2020, p. 11). A report by the Democratic staff of the House Committee on Natural Resources concluded that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al*. 2016). As of 2016, Africa had the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by the year 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al*. 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts. Poverty and the necessity for rural people to obtain some income are the main drivers of bush meat poaching in Zambia. Since 2016, DNPW has continued to work with ZCP and Conservation South Luangwa (CSL) to mitigate snaring by-catch through intensive monitoring of collared wild dog and lion groups through ground, aerial and satellite/ GPS tracking, coupled with data-directed anti-snaring patrols, field-based veterinarians. In the Kafue ecosystem, DNPW worked with ZCP and Panthera through their newly-formed anti-poaching units, as well as, with hunting operators' anti-poaching units, which confirmed no reports of snared carnivores in 2018, with one lion treated for an old snare injury.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe had been imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions was a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding, breeding, and commercial use (i.e. walking and petting) of captive-bred lions is banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

NGOs are also a source of supplemental revenue sources. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Although the success of the moratorium cannot be fully assessed, there is some information available that indicates that lion populations are stable or increasing (DNPW 2020, pp. 10-11).

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosysteMr. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2020, 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting

blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelope system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes are only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2020, 2016). As of 2018, the quota was reduced to 31. The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW has transformed the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The guidelines were revised in 2019 from those developed in 2016 for lion and in 2018 for lion and leopard and are meant as an instrument to provide technical guidance on the scientific methodologies to be used on lion aging and on some methodologies for lion and leopard hunting and status monitoring. These guidelines also incorporate details pertaining to the monitoring of leopard hunting and status. The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Since the adoption of this practice in 2016, DNPW has introduced a legally binding regulation that will enter into force for the 2020 season (DNPW 2020, p. 42). The Guidelines shall be regularly

updated to reflect advances in scientific knowledge in order to guide technically the implementation of the regulations. The new management approach to Lion hunting in Zambia is based on three pillars: i) a conservative, precautionary quota, well below one of the recommended thresholds for sustainability, ii) an age–based harvest limit and strong monitoring of lion offtakes, and iii) significant and direct community benefits. This will ensure that lion hunting in Zambia is sustainable and does not negatively affect the population. In addition, in the hunting concession agreements signed in 2015, no hunting outfitter has been guaranteed a lion on quota. It is made clear that the quota for any species shall be based on scientific methods including the latest available survey and aging techniques.

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. DNPW also receives funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.

- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and permit issuance criteria (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated its desire to maintain the long-term conservation of its lion population with its 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that it has established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy-hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has identified how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2020, 2016). Monitoring, local community benefits, human lion-

conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Dement's hunting and subsequent import of this lion provides an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species is positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion trophy would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr.

Dement will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Dement, in managing the lion populations in GMAs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency, they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Dement.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion trophy will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Joseph David Dement.**

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of

trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016 (rev Jan 2020). Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA08062D-0
Effective: 05/06/2020 Expires: 05/05/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.05.06 08:36:16 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:
JOSEPH DAVID DEMENT
(b)(6)
OAKFIELD, TN 38362
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

SEP 2 7 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1 a. Last name	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Webster	Jason	C	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b)(6)			

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address
(b)(6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1 a. Name of business, agency, Tribe, or institution	1 b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. Primary contact name

7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

C. All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)				
(b)(6)				
1 b. City	**1 c. State**	**1 d. Zip code/Postal code**	**1 e. County/Province**	**1 f. Country**
Houston	TX	77036	Harris	USA

2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)				
2 b. City	**2 c. State**	**2 d. Zip code/Postal code**	**2 e. County/Province**	**2 f. Country**

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in Subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief, and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 3/14/18

Signature (in ink) of person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Lion - Leo Melanochaita

   b. Sex (if known).

      Unknown

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Zambia; Nkala game Management area; Kaflie Valley Region; Nearest Town: Itezhi Tezhi; GPS Coordinates of area HQ - S15'54.520' E026'00.233'

   b. Date wildlife is to be hunted:

      July 21 - August 10 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      Skin & Skull

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Mike Borman
Business Name: Bangweulu Taxidermy Limited
Address: 4142/K Chifwema Road
Address:
City: New Kasama, Lusaka
State/Province: Zambia
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In ad[redacted]and that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b)(6) [redacted] Date: 3/14/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

   Jason C. Webster
   6200 Savoy Dr., Suite 150
   Houston TX 77036

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
    Jason Webster (b)(6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Management Authority, FWHQ <managementauthority@fws.gov>

[EXTERNAL] Permit Cancellation

2 messages

Rosi Barraza (b)(6) Tue, Oct 2, 2018 at 11:03 AM
To: "managementauthority@fws.gov" <managementauthority@fws.gov>

Hello,

On behalf of Mr. Webster, please cancel the following permits. As he will no longer be in need of these. Thank you in advance.

Permit #09896D - Lion

Permit #09897D – Leopard

Sincerely,

Rosi Barraza

The Webster Law Firm

6200 Savoy Dr., Suite 150

Houston, TX 77036

713-581-3900 Phone

713-581-3907 Fax

www.thewebsterlawfirm.com

***Please note all invoices MUST be sent to accounting@thewebsterlawfirm.com and/or 713.581.3907. or you will not be paid.**

*This email address does not satisfy e-service requirements and is not meant for e-service. Should you need to serve a document in accordance with the Texas Rules of Civil Procedure, please email it to filing@thewebsterlawfirm.com

NOTICE OF CONFIDENTIALITY: The information contained in and transmitted with this email is (1) Subject to the Attorney-Client Privilege; (2) subject to the Attorney Work Product Privilege; or (3) confidential. It is intended only for the individual or entity designated above. You are hereby notified that any dissemination, distribution, copying, or use or reliance upon the information contained in and transmitted with this e-mail by or to any other than the recipient(s) named above by the sender is unauthorized and strictly prohibited. If you think that you have received this message in error please delete it from your inbox folder and from you trash immediately. If possible, please call (713) 581-3900 so that we may address the problem. Thank you in advance for your kind assistance.

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Oct 4, 2018 at 9:39 AM
To: Rosi Barraza <rbarraza@thewebsterlawfirm.com>

Ms. Barraza,

Thank you for the clarification.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

[Quoted text hidden]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

SEP 2 7 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
GALLMANN	KAREN		

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			MATT@GENUSLOGISTICS.C

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ANGELICA	NY	14709		US

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Atty-in-fact 7/12/18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   GENUS LOGISTICS / MATT MAYERS 161-15 ROCKAWAY BLVD STE 205 JAMAICA NY 11434 SASE FEDEX INCl

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   MATT MAYERS 718 790 0216 / MATT@GENUSLOGISTICS.COM

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO MELANOCHAITA , LION

b. Sex (if known). FEMALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

FARM GROOTFONTEIN, LEPHALALE SOUTH AFRICA

b. Date wildlife was hunted:

October, 2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

MPC BAMBERGER
PO BOX 286
LEHALALE SOUTH AFRICA 0555

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

MPC BARNBERGER / WARTHOG SAFARIS
PO BOX 286
LEPHALALE SOUTH AFRICA 0555

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). PERMIT #014312

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	MPC BARNBERGER WARTHOG SAFARIS
Address:	PO BOX 286
City:	LEPHALALE
State/Province:	
Country, Postal Code:	SOUTH AFRICA 0555

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 3/22/19

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ORDINARY PERMIT

PERMIT NUMBER: O № 14312

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	LEGAL ADMIN SERVICE CENTRE ENVIRONMENTAL AFFAIRS
ADDRESS	LIMPOPO PROVINCE
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME	Karen Marie	ID NO.	
SURNAME	Gallmann	PASSPORT NO.	(b)(6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		(b)(6)
ADDRESS		Anywhere
ADDRESS		New York
TOWN		
POSTAL CODE		14709
PROVINCE		USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MPC Bamberger
NAME AND SURNAME: RESPONSIBLE PERSON	MPC Bamberger
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Grootfontein 534 LQ
PHYSICAL ADDRESS OF FACILITY	Lephalale
DISTRICT	Waterberg
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (In the case of game farm)	Grootfontein 534 LQ

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(If known)		(If applicable)
Lion	Panthera leo Melanochaita	Female	One (1)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunting — On = Farm Grootfontein 534 LQ, Lephalale Municipality, Limpopo Province

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:

NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	Karen Marie Gallmann
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	MPC Bamberger
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	MPC Bamberger
WEAPON AND METHOD OF HUNTING	Rifle 375 H&H, Walk & Stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY — FROM: 28/09/2016 — TO: 28/10/2016

RECEIPT NUMBER 10 [illegible] 902 — R100

S. Ndhlukulangani

SIGNATURE OF ISSUING OFFICER:

DATE STAMP:

SIGNATURE OF PERMIT HOLDER:

POWER OF ATTORNEY

Matthew Mayers d/b/a Genus Logistics
76 Albany Blvd. Atlantic Beach N.Y. 11509
Office: (718) 790-0216 Fax: (516) 400-9787 Email: matt@genuslogistics.com

Customs Rules on Discharge of Importers Liability for Duties

The U.S. Customs Service has issued a final amendment of the regulations to provide an alternative procedure for an importer record to pay duties on imported merchandise through a licensed customhouse broker. Present rules provide for the payment of duties to Customs by a broker on behalf of the importer. Under the alternative procedure, the importer may elect to submit to the broker a separate check or bank draft for the duties payable to the "U.S. Customs Service". The broker would then deliver the importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients, advising that if the client is an importer of record, payment to the broker will not relieve the client of liability for Customs charges in the event that the charges are not paid by the broker. Brokers will be required to provide this notification to all active clients annually during the month of February. Additionally, brokers will be required to provide such information on a power of attorney executed on or after the effective date of the new rule. These amendments are effective as of September 27, 1982.

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE ON YOUR BEHALF.

Department of the Treasury
U.S. Customs Service Individual
141.32, C.R.

Social Security (b)(6) [redacted]

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, KAREN MARIE GALLMANN (Full Name)

Residing at, (b)(6) [redacted] BELFAST NY 14711

hereby constitutes and appoints each of the following persons Matthew Mayers dba Genus Logistics

may act through any of its offices or any employees with Power of Attorney on file with this licensed broker as required by the Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, stead of said grantor from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or assigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandise; to receive any merchandise deliverable to said grantor;

To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate, and delivery abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any customs district.

To sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owners declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise

To sign and swear to any document, and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated said grantor.

To authorize other Customs brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantors name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor.

And generally to transact at the customhouses in said district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, in which said grantor is or may or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents; the foregoing power of attorney to remain in full force and effect until notice of revocation in writing is duly given to and received by the District Director of customs of the district aforesaid. If the donor of this power of attorney is a partnership, the said the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution.

Pursuant to 19 CFR 111.35(a), election is made waiving the right to receive invoices, supporting documents and correspondences from Matthew Mayers dba Genus Logistics, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Matthew Mayers dba Genus Logistics, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

IN WITNESS WHERE OF, the said (Print Name): KAREN M. GALLMANN

has caused these presents to be sealed and signed: (Signature) (b)(6) [redacted] Date: 11/27/15

WITNESS: Diana L. Grastorf Date: 11/27/15

DIANA L. GRASTORF
Notary Public State of New York
Qualified in Allegany County
No. 01GR6050132
Commission Expires 10/30/20 18

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed LION Trophy from SOUTH AFRICA.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

(b)(6) [redacted]

SIGNATURE

KAREN M. GALLMANN

KAREN GALLMANN

6/19/20

DATE

[EXTERNAL] Notice of Representation for Permit #'s 70352D , 09915D and 09916D

Aimee Korver <permits@conservationforce.org>

Wed 6/24/2020 12:48 PM

To: Nelson, Emma G <emma_nelson@fws.gov>; John Jackson, III <jjjiii@att.net>

3 attachments (1 MB)

NOTI Rep-signed.pdf; Notice of Representation 1.jpeg; Notice of Representation 2.jpeg;

Ms. Nelson,

Please find the attached Notices of Representation for applicants, Karen Gallmann and Brett Parker.

Ms Gallmann has import permit applications for a lion and an elephant from South Africa.

Mr. Parker has an import permit application for a lion from South Africa.

Please let me know that you have received these documents and if you have any questions.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: James Lines

Date: April 2, 2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD APR 10 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Lines	James	Kevin	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Colleyville	TX	76034	Tarrant	U.S.A.

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S

(b)(6) [redacted]

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): April 2, 2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   James Lines(b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera, Panthera leo, P. l. melanochaita,Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Lower Lupande Game Management Area, Mfuwe, Eastern Province, Luangwa Valley, Zambia

   b. Date wildlife is to be hunted: August 6 - August 13, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   WH van Noordwyk

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). This animal has not been hunted yet.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name: Sando Sinkala
   Business Name: BRIDGE SHIPPING ZAMBIA LIMITED
   Address: VILLA PARK, PLOT 177/178 UNIT C3 LUANSHYA, ROAD
   City: LUSAKA
   State/Province: LUSAKA PROVINCE
   Country, Postal Code: ZAMBIA 10101

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ (b)(6) _____ Date: April 2, 2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

KWALATA SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: kwalatapeter@yahoo.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Kwalata Safari Company, Ltd. has been operating in Lower Lupande Concession since April 2002. The concession provides habitat for a range of species including buffalo, lion, hippo, kudu, leopard, elephant, impala, bushbuck, hyena, warthog, zebra, giraffe, and waterbuck. Our concession is about 1511 kilometer squared and is in the South Luangwa Safari Area. Lower Lupande is rated under Zambia Government Legislation as one of the Prime Hunting Blocks in Zambia due to the abundance of wild life and cats. We have a lease with the Wildlife Authority for seven years renewable which started in 2015 after the new allocations of hunting blocks in Zambia with the new Government.

The company is a partnership between Peter Chipman and Zaeed Patel and has been operational for more than fourteen years. We employ three professional hunters, four game trackers, ten anti-poaching scouts and eight camp staff (cooks, cleaning, miscellaneous). Altogether our operations support at least 100 dependents in local villages apart from the local employed camp staff and scouts.

We have a written concession plan with anti-poaching and community components.

II. ANTI-POACHING COMPONENT

Kwalata Safari Company maintains two five-man anti-poaching teams at an annual cost of over $ 25000. Each team is equipped with a four-by-four vehicle, a motorbike, uniforms and boots, tents, rations, and a satellite phone. Our teams closely cooperate with the Wildlife Authority to conduct almost daily patrols of the concession and the border of the South Luangwa National Park. We supply rations at least twice per month to the government game scouts to ensure they are sufficiently equipped for the patrols as well as transport support and more over and above the above mentioned amount per year.

Our contract with the local community requires that part of the revenues paid to the community be used to fund at least six community game scouts, and additionally we supply rations at least twice per month to these scouts.

We heavily patrol our area, conducting approximately one patrol per day by vehicle and foot. In the past year, our teams picked up about 1000 snares, 40 gin traps, and two poisoned licks. Removing snares protects the lion and wildlife population by reducing incidental snaring. Over the past year we arrested more than ten poachers, confiscated three bicycles and five muzzle loaders from them, as well as recovered 14 weapons total. We found two elephant carcasses each having tusks removed, the bones of one impala, some evidence of illegal logging, and a Leopard with a snare wound.

If needed, we subsidize the government game scouts. Every month we provide one week's rations to support a dozen Wildlife Authority scouts and contribute $ 500 in petrol to the Wildlife Authority.

We also send out road crews approximately every two weeks to check the condition of the roads in the concession, to ensure we are able to patrol effectively.

In the picture above wire snares recovered from poachers

In the picture above an elephant which was poached had its tusks removed

In the picture above a Leopard skin recovered from poachers by our vigilant game scouts.

In the picture above our Scouts being prepared to go on Patrols

In 2015 Kwalata Safari Company spent almost $ 57400 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 6000 liters of diesel for patrol vehicles. We recorded 363 patrol days and well above 2000 patrol hours. And made over $ 4200 in payments of rewards. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	18000	Directly paid and some subsidies to WA
Scout equipment	5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	7700	For scouts and WA
Rations for WA and community scouts	6500	
Micro light rental and fuel	16000	Including time donated to WA
Rewards	4200	For information and arrests
TOTAL	$ 57400	

Our concession agreement requires that we have an anti-poaching program/plan and report about it to the Wildlife Authority. The Wildlife Authority considers our contributions in determining whether to renew the concession.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the two closest villages which are Malama and Kakumbi.

We pledge an annual contribution of at least $ 15000 in projects to each of two villages. And in return ask for a list of preferred projects of witch we develop a work-plan in consultation with village leaders and citizens to fund and supply projects and require a measure of community contribution to each project either through a council donation or more frequently, through donations of time by workers. In 2015 we funded and supplied the following projects at each village's choice:

Village	Projects	Amounts (USD)
Village 1	Renovations of schools	18100
Village 2	Designing and constructing village office	3100
	Funding youth sports league including transport	1900
	Providing new equipment for village game scouts	800
	Paying teacher salary and school fees for poor children	6100
	Digging new borehole and building pump station	3500
		15400
	TOTAL	$ 33500

In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. The villages have the choice to eat the meat or sell it. In 2011 the value of this meat was $ 30000. 2012 the value was $ 33000. 2015 the value was $ 27500.

Our concession agreement requires we have a community assistance program/plan and report on the program to the Wildlife Authority. The Wildlife Authority considers these contributions in determining whether to renew our lease.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. We also maintain an approximately $ 12000 fund of client donations which we use for community compensation. In 2015 we received 82 reports of problem animals and we made it through the entire season without a problem animal kill. We paid out $ 2650 in compensation for lost livestock and crops.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have enhanced water infrastructure for wildlife in our concession by maintaining four pans to increase water supply and carrying capacity of the concession which gives allot of Antelope Species for Lion/Leopard food chain and habitat for their sustainable and healthy survival.

V. OTHER INFORMATION

A. Prey Base

Kwalata Safari Company's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past five years. We estimate that our Buffalo and Plains Game populations have shown an increase of 15-20% per annum. In 2014 our Wildlife Authorities flew over the Game Management Areas in a large-mammal survey and counted more than 1000 buffalo on average.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Kwalata Safari Company maintains a lion sightings record in form of camera pictures taken as well as trail camera pictures, sightings, spoor and footprints on individual, groups and passing through cats. Because we keep tabs on the lion in our concession, we are assured that the regulated, limited off take is sustainable. Our wildlife Authorities have also provided us with a data recording sheet to use on all Lion/Leopard Safaris as off 2015 to take record of sightings and record the activities on the specific safari being done. We have a 100% success on all our hunts.

C. Lion Aging Approach

Kwalata Safari Company has been following an age-based policy for African lion trophies since 2015, when we adopted this Policy after a mutual agreement with our wildlife Authorities and to be conservative in estimating age.

As a result of this, Lions have been passed up by a number of potential Lion before allowing a client to harvest a specimen that we have any doubt is of on age. We also don't allow any client to shoot a lion of which there is any doubt on the age limit if the lion looks anything less than 5 years of age but rather try and shoot a lion that looks more the like of more than 6 years of age.

In 2016, we successfully harvested mature (aged six or older) male lion up to our quota (of two). We have been able to harvest our full quota this year because our selectivity has resulted in more lion reaching an advanced age.

D. ELEPHANT HUNTING

Our Wildlife Authorities have put up a policy not to Harvest any Elephant that has its tusks weighing less than 15 kilograms. In view of this our Professional Hunters are instructed to not harvest an Elephant with weight in tusks of less than 20 kilograms at a minimum and to be very selective when Hunting Elephant by ensuring that they comply with this agreement. The wildlife authorities have put up stringent measures to any Professional Hunter who goes against this rule which may even include withdrawing his Professional Hunting License.

E. U.S. Hunters

Most of our clients are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

Kwalata Safari Company's regulated, confirm that our sustainable-use based hunting program enhances the survival of the Lion and Elephant and we recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa

Signed: _____

Operator Name: Kwalata Safaris © LTD

Title: DIRECTOR

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-85336C

Enhancement Finding
Applicant: James Kevin Lines (PRT-85336C)

James Kevin Lines submitted an application on April 10, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken August 6, 2018, through August 13, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth

a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the

current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Lines' application involving a *P. l. melanochaita* sport-hunted trophy taken in the **Lower Lupande GMA**, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently

facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Lines' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Lines', participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Lines' application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Lines' hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Lines will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Lines, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Lines.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to her to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Kevin (b) (6) Lines.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority
6/8/18

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA85336C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coogliano

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JAMES KEVIN LINES
(b) (6) [redacted]
COLLEYVILLE, TX 76034
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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August 11, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD OCT 26 2018

RE: Application for Permit to Import Sport-Hunted Lion Trophy, Ken Grosslight

Dear Chief Cogliano:

Enclosed please find one application for a permit to import a sport-hunted lion trophy from the Niassa Reserve Mozambique. We have included additional enhancement information in the DMA's files submitted by Conservation Force and Mozambique's Parks and Wildlife Management Authority, in making a positive enhancement finding for the applicant.

Please do not hesitate to contact us if you have questions about this application or need further information

Sincerely,

John J. Jackson III

Encl:

- Authorization of Representation
- Grosslight import permit application

3240 S 1-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: *(504)* 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted Panthera Leo (Lion) trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: Ken Grosslight

Date: 5/16/18

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD OCT 26 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Grosslight	Kenneth	Russell	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b)(6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, must provide their U.S. address)

(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Blythewood	SC	29016	Richland	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is [illegible]t of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties

(b)(6)

5/16/18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1.** If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ✓ Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo (Lion)

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   Mozambique Niassa Reserve Hunting Block R3

   b. Date wildlife is to be hunted: 9/5/18 – 9/27/18 using Traditional bow and arrow.

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Safaris De Moçambique

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   N/A

   b. Date wildlife was hunted: N/A

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with: N/A

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]: N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
   I have not hunted yet.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Simon Cate
Business Name: Safaris de Mozambique
Address: 138 North Beach Road
City: Westbrook
State/Province: KZN, RSA
Country, Postal Code: 4422

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?
   Please see attatched Typed sheet for answers to #9.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

9 (a). The Niassa Game Reserve is estimated to hold 1,573 lions in 177,559 squared Kilometers (Riggio et al 2012). This is an increased number or lions from a previous study in 2006 that estimated 800-900 animals (IUCN SSC Cat Specialist Group). Also, an even earlier survey in 2002 estimated 500 lions in the reserve (Chardonnet). Chardonnet in 2008 reported that the lion offtake was very low nationally. He also speculates that there are more lions in Mozambique than previously thought. The BBC in an article from July 9, 2015, quoted Colleen Begg who is the head of the Niassa Carnivore Project as stating that the numbers of lions has increased secondary to increased food availability due to elephant poaching. Chardonet states that the "Niassa Game Reserve hosts the largest single population of lions in Africa" (Conservation Status of the lion in Mozambique, June 2012). He estimates 1-3 lions per 100 squared Kilometers.

Importantly, Mozambique has completed a "Conservation Strategy and Action Plan" for the African Lion (Beggs 2010). Lions are on a strict quota system in this country.

This National Reserve and Southern Tanzania, which borders the Reserve has the highest adverse lion-human encounters in all of Africa.

9 (b). The daily hunting fee includes license fees and some of these fees go to funding an anti-poaching unit. The trophy fee is $20,000, part goes to the government and 20-30% is returned to the community. The concession is classified as a community hunting area, the Outfitter has made an independent commitment to improve the lives of the local African people. The villages and communities on the concession receive the majority of the meat from the animals which are hunted on Safari. This not only provides these people with a vital source of protein but creates an incentive for the local communities to conserve the wildlife, ensuring that they continue to prosper from it in the future. The outfitter employs more than 50 people during the hunting season. The average Bread-winner to dependent ratio is 1-8, which means that on average the company supports more than 400 people directly through employment

To date, assistance to these communities has included the building and equipping of schools, and an administrative center, and the drilling of boreholes to provide villages with potable water. Motorbikes have been given to the local police by the company, to assist in their efforts with fighting crime and WILDLIFE crime.

9 (c). There is an active "Conservation Strategy and Action Plan" in the Niassa Game Reserve (http://www.niassalion.org/library_files/2010%20Mozambique%20Lion%20Conservation%20Strategy.pdf). This Outfitter goes to great length to try to make sure that any harvested lion is at least 6-7 years old judging by nose color, mane configuration etc. The Outfitter is increasing his full time, year-round anti-poaching unit from 12 to 20 scouts with funds from this hunt. Safaris de Mozambique (the outfitter) is 100% committed to the conservation of wildlife. They are well aware that the future of the community, the company and the Ecosystem of the concession is very much defendant on the management of the wildlife resource, and through investment and a sustainable land use model they plan to ensure this future is secure.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: N/A Date: _____

11. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: (b)(6) Date: 5/16/18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

X	EXPORT	CITES PERMIT N.° MZ_0062/2019
	RE-EXPORT	ORIGINAL
	IMPORT	
	OTHER	2. Valid until 10/08/2019

3. Consignee (Name and address)
KENNETH GROSSLIGHT
C/O SPLITTING IMAGE TAXIDERMY
THE HAVEN FARM - GRAHAMSTOWN
6140 EASTERN CAPE PROVINCE

3a. Country of destination Z A

4. Permitee (name and address, country)
SAFARIS DE MOÇAMBIQUE
AVENIDA DA LIBERDADE - C.P.433

TETE - MOÇAMBIQUE

5. Special conditions
Personal sport hunted trophy
For live animals, this permit or certificat is only valid if the transport conditions comform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations.

5a. Objective of the operation (See reverse) H

5b. Security stamp N.° MZ_1590794

6. Name, address, national seal/stamp and country of Management Authority
REPÚBLICA DE MOÇAMBIQUE
ADMINISTRAÇÃO NACIONAL DAS ÁREAS DE CONSERVAÇÃO
AUTORIDADE ADMINISTRATIVA CITES
TEL: 21 302362 - FAX: 21 302363

7/8. SCIENTIFIC NAME (GENUS AND SPECIES) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of part or derivative, including identifying marks or numbers (age/sex if live)	10. Appendix N.° and source (see reverse)	11. Quality Number of Specimens and/or net Weight (KG)	11a. Total exported/ /Quota
A Panthera leo melanochaita Lion		W.II	01- Skull	

12. Country of origin*	Permit N.°	Date	12a. Country of last re-Certificate n.°	Date	12b. N.° of the operation ** or date of acquisition ***
MOÇAMBIQUE	MZ_0062/2019	10/02/2019			
B. Panthera leo melanochaita Lion			W.II	01- Fullmount	
MOÇAMBIQUE	MZ_0062/2019	10/02/2019			
C. XXXX

Management Authority, FWHQ <managementauthority@fws.gov>

[EXTERNAL] CITES #13247D addendum

1 message

kgrosslight@aol.com (b)(6) Thu, Feb 7, 2019 at 8:14 PM
To: managementauthority@fws.gov

Hello, above you will find a PDF attachment that you may wish to add to my application 13247D for an African Lion.
This attachment is a PDF of the CITES permit from Mozambique where the lion was harvested.
Thank you for the attention to my application.

Best Regards
Ken Grosslight

027 Grosslight - Lion MZ_0062 2019.pdf
2046K

Re: [EXTERNAL] more information for permit 13247D

Nelson, Emma G <emma_nelson@fws.gov>

Mon 6/1/2020 7:44 AM

To: kgrosslight@aol.com <kgrosslight@aol.com>

Good morning Mr. Grosslight,

Thank you for sending this addional inf ormaon. It will be added t o your file.

Best,
Emma

From: kgrosslight@aol.com (b)(6)
Sent: Monday, May 25, 2020 6:51 AM
To: Nelson, Emma G <emma_nelson@fws.gov>
Subject: [EXTERNAL] more informaon f or permit 13247D

Hi Monica, hopefully you are working from home. I am sending more information to be placed in my file regarding the outfitter and his wildlife conservation endeavors in the concession where I hunted Lion in Mozambique. Thank you in advance for all your help.

Sincerely
Ken Grosslight

-----Original Message-----
From: Safaris de Moçambique <simon@rodger.biz>
To: Ken <kgrosslight@aol.com>
Sent: Sat, May 23, 2020 7:09 am
Subject: Safaris de Moçambique 1st Quarter Newsletter 2020

2020 FIRST QUARTER NEWSLETTER

Director's Message

Dear friends,

Thank you for your unbelievable support. We are truly humbled. Although conservation areas across the African continent are facing a severe challenge, the hunting community and industry has shown its true colours over the last couple of months, during these times of unprecedented uncertainty for all hunters. In times like these, we must work towards finding solutions. Together we are important custodians of African wildlife.

As a company, SDM's priority is the protection of our area and the wildlife within it. During this time we have focused our efforts on anti-poaching and essential services in the Panyame Wildlife Conservancy such as our community projects. Further to the responsibility of protecting our wildlife, we also have an obligation to our loyal workforce. Safaris de Moçambique supports an average workforce of 60 individuals from the local community. With an average breadwinner to dependant ratio of 1:8, the company supports almost 500 people.

We are working hard to document all of the work that is being done on the concession and look forward to sharing both our successes and our failures with you!

Best regards,

Simon Rodger
Managing Director

Law Enforcement and Wildlife Protection

There a currently 20 game scouts in the company anti-poaching unit. With so much land to play with, there's no such thing as too many boots on the ground. We have to cover as much ground as possible to be effective. Due to the wet conditions of January, February and March, it has been difficult for the scouts to stay on poachers' spoor. From Jan through April, 21 extended patrols were completed both on land and water together with officials from the Tchuma Tchato program and local authorities leading to:

- 56 illegal nets confiscated
- 28 wire snares removed
- Active Control of all water points
- Two near arrests with Poachers in the Eastern section of the concession. Unfortunately, they escaped this time! Very difficult to stay on the tracks in the rainy season.

Each snare removed leads to dozens of animals saved because a poacher will keep reusing the same trap.

The Nzou Group after confiscating several illegal nets on a patrol in the Headwaters.

Water patrols

We have allocated 100 litres of petrol per week to two permanent teams tasked with patrolling the fisheries at both the Mbadzi and Main camp area. Comprised of both company members and scouts from the Tchuma Tchato Programme, these teams are in search of illegal, undersized and unlicensed nets in both prohibited and designated fishing zones.

Some of the culprits of illegal fishing are from Zambia or Zimbabwe and are not supposed to be fishing in Mozambique waters. Others are Mozambicans without licenses or who fish with illegally sized nets. The water patrols have been a massive success as you can see from the sheer number of confiscated nets.

The teams confiscated 56 nets in total during the first quarter of 2020. With an average length of 400m, translating to 22.4 km, each confiscation leads to tens of thousands of fish saved.

Indeed it is our full intention to keep this effort up. The teams are being rotated every 10 to 14 days, with members from the local authorities accompanying each group. As long as we can continue this effort, we can expect to see a dramatic change in the fishery.

This project will bring significant benefits to the local community, ensuring that licensed fisheries remain profitable and sustainable. In the past, we have found that bushmeat poachers use fishing as a scapegoat. Preventing fishing vessels from entering prohibited areas tackles this problem effectively.

Finally, recreational fishing will improve exponentially due to increased law enforcement.

Human-Wildlife Conflict

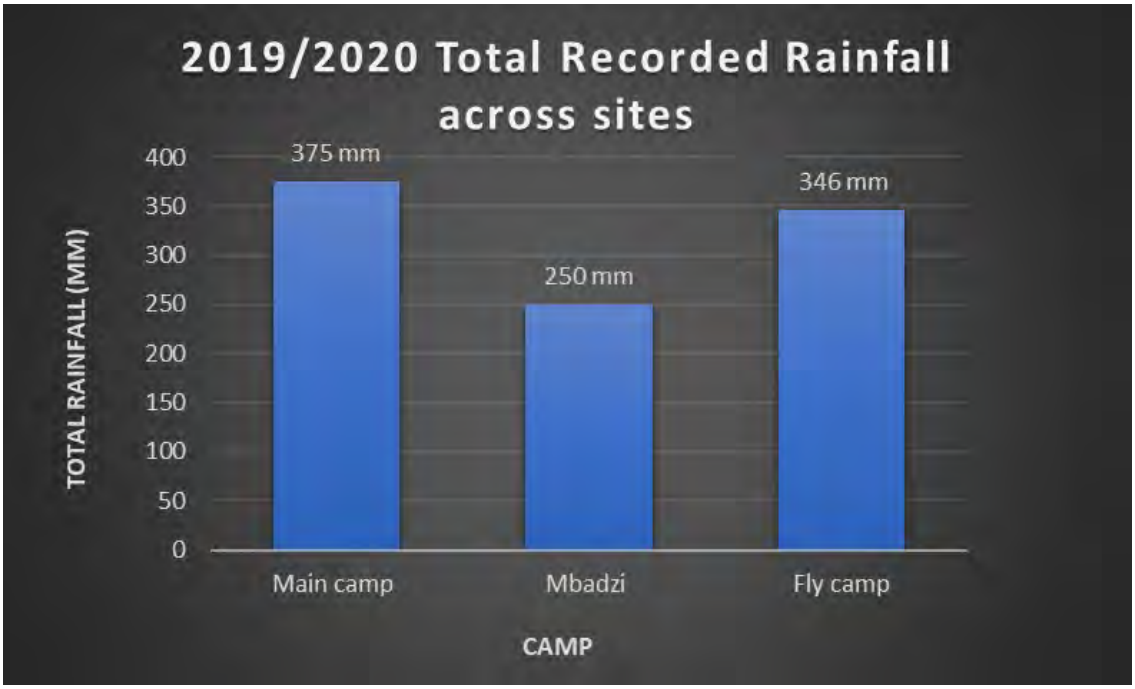
Human-Wildlife Conflict (HWC) was a severe problem in the area in 2019 with cases of conflict reported almost daily. In 2020 we are committed to developing

new ways and means of mitigating this ongoing problem.

The company was recently asked by the local authorities to intervene and destroy an aggressive crop-raiding Hippo near Tsingano village on the Panyame river. The skinners removed an old muzzleloader round from the Hippo carcass, shown in the below image—a reminder of the age-old conflict that occurs between megafauna and people.

This the second incidence of human-wildlife conflict we have dealt with so far this quarter.

A muzzleloader round pulled out of the Hippo.



The first rains were recorded on the 15th of November, and the last on the 17th of March.

A Void to fill: Meat Distribution Program

Annually, Safaris de Moçambique delivers roughly 20 tons of meat to the local community. This programme is an integral part of conservation in the area. The regular distribution of meat to the community removes the need for local people to poach.

The lack of hunts in 2020 will lead to a shortage of protein in the villages, and consequently poaching will increase. We are looking at allocating a portion of the budget for 2020 to buying cattle and goats from the local community, butchering and delivering the meat. Key positive takeaways of this project are the following:

1. Meat derived from the hunting quota will be replaced by livestock animals, thus allowing the company to fulfil its obligations to the local community

and distribute the same amount of protein to the villages.
2. The wildlife population shall rest this year as the company will not fully utilize the quota.
3. Livestock used for this project will be bought from farmers in the surrounding communities and paid for in cash, thus bringing economic benefits for the local community.

Borehole Maintenance

A considerable amount of work goes on behind the scenes in preparation for the end of the rainy season. Simon and Theuns have been getting all the solar pumping systems back up and running.

These water sources are essential for the wildlife and are leading to increased utilisation of grazing in various areas around the concession. We expect to see a dramatic increase in wildlife populations in certain areas because of solar water projects.

See a few pictures below of the pans in all their glory, full of water from the solar systems. We are proud of these systems, and the design is unique. They are theft-proof, waterproof. ...Pretty much bulletproof!

Community Assistance

A community assistance success story during the first quarter of 2020 is that of Chengetai Catapura, a woman from Kabundu village who had severe and life-threatening complications while giving birth to a child. We received a call from Richard Mukende, the chairman at Kabundu village requesting our assistance. We rushed to dispatch a vehicle in time, and she was sent to the clinic across

the river to receive urgent medical care. Without this transport, she would undoubtedly have died.

We continue to help the community with repairs and maintenance on an as and when basis. They have ongoing issues with bicycles, donkey carts etc. One repair that springs to mind so far this year is the maize grinding mill belonging to Coleni Adau, a conservation committee member at Chikodzero village. Without this maize grinding mill, the residents of Chikodzero village are unable to produce mealie meal for food.

The company recorded the following cases of Community assistance during the first quarter:

- Two instances of Emergency medical transport
- Two instances of PAC attended to (Problem Animal Control)
- Several community repairs at the workshop
- Eight footballs distributed to local schools (Pre-COVID-19)

Upcoming Projects

Law Enforcement

- We are currently seeking funding to train and employ an additional 30 game scouts, an increase to 50 in total from the current 20. The reason behind this being the lack of presence throughout the area due to no hunting activity. This presence is a major addition to the anti-poaching

framework through continual traversing of the area. Under normal circumstances, this would occur on a daily basis, throughout the concession from April to November.

- The water patrols have been successful thus far, and we will be continuing this project indefinitely. We have allocated over 100 litres of petrol per week to the patrol teams at Mbadzi and Mizunga base.
- We are currently looking into the use of two conservation tools to assist us in our law enforcement and ecological monitoring efforts. These are SMART Conservation Tool (Spatial Mapping and Reporting Tool) and EARTHRANGER software. A trained technician and mobile devices are needed to implement the project.

SPONSOR A GAME SCOUT

Ecological Monitoring

Simon has installed camera traps at all the waterholes. We are looking forward to seeing some of the videos and pictures and we will be sharing these on our social media channels as well as in our next newsletter!

Community Projects

The following community projects are planned for the next quarter:

- Renovations of the School in Capessa Village
- Renovations of the school in Nhanchenje Village
- Construction of the community centre in the Chintopo area.
- Repairs to the solar pump that we installed at the clinic in Chintopo, which has stopped working due to the theft of components.
- Repair of the solar system at the clinic in Chitete.
- The borehole we drilled for the community at Mamuira has run dry, we are planning on drilling a replacement.
- Launch of the Human-Wildlife Conflict Prevention Unit. We are currently in discussions with the authorities about solutions to these problems, with a specific emphasis on non-lethal solutions.
- Conservation Education courses for kids from the local community will resume as soon as the COVID-19 situation allows for it.

CLICK TO DONATE

Special Thanks

We would like to thank a few special people for their help over the last few months:

- Thank you to John Jackson from Conservation Force, for your contribution setting up channels to fund conservation areas across Africa.
- Thank you to Ivan Carter for supporting our work through his Ivan Carter Conservation Alliance which is a 501c3 in the US.
- A big thank you to the Dallas Safari Club for their anti-poaching initiative to help safari companies during the COVID-19 epidemic. We received a $5,000 USD donation from Dallas Safari Club.
- Last but not least a huge thank you to our clients and friends who have donated funds so generously and without which none of these conservation and community efforts would be possible.

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Mozambique

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[EXTERNAL] Supplement document for PRT # 13247D

Aimee Korver <permits@conservationforce.org>

Tue 6/2/2020 2:47 PM

To: Nelson, Emma G <emma_nelson@fws.gov>; John Jackson, III <jjjiii@att.net>

1 attachments (12 MB)

SafarisdeMocambiquenewsletter.pdf;

Ms. Nelson,

Please include the attached document as a supplement to the enhancement findings for the import permit application# 13247D for Ken Grosslight. It is to import a sport-hunted lion from Mozambique.

If you have any questions regarding this matter, please feel free to contact me.

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

KENNETH R. GROSSLIGHT MD, JD

August 25, 2020

RCVD SEP 03 2020

Dear Emma:

I trust this communication finds you in good health. This is in regard to my Panthera Leo import application 13247D. I wanted to bring to your attention to 3 new articles and a book summary regarding conservation of this species. These articles are from IUCN, Ruaha Carnivore Project, and from a book by Keith Somerville titled "Humans and Lions, Conflict, Conservation and Coexistence." They all concede that trophy hunting is not a threat but instead provides protection of large tracts of land possible by hunter fees. This allows for more land than most African countries can afford, as they can barely take care of their citizens and wildlife protection takes a back burner. The private hunting concessions provide less human invasion and loss of habitat to agriculture and the likes. It also provides for significant anti-poaching efforts that the local government cannot afford. These blocks provide protection for all species of quadrupeds by strict quotas, reduction of snares and other poaching methods and prevention of cattle etc. from grazing on these lands. This leads to less lion-human conflict. I have taken the liberty to highlight very pertinent sections of these articles and book excerpts. I hope you find these informative and please add them to my application if possible.

It has been two years since I made my initial application and have been told it is complete but still pending. Could you explain exactly what "pending" means and what further steps are being taken to complete this lengthy process? I would be most appreciative.

Please let me know that you have received these publications and also feel free to call if you would like regarding what is suppose to happen to my application next and when that might occur.

Thank you for your time and support.

Sincerely,

Ken

Kenneth Grosslight, MD JD
803.351.5600
kgrosslight@aol.com

335 PERSIMMON FORK ROAD, BLYTHEWOOD, SC 29016
803.351.5600
kgrosslight @aol.com

ROUTLEDGE
ENVIRONMENTAL
HUMANITIES

earthscan
from Routledge

Humans and Lions

Conflict, Conservation and Coexistence

Keith Somerville

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attempt to summarise the arguments. I will not attempt to disentangle the more philosophical/ethical arguments about the rights and wrongs of hunting as an activity – it is worth noting that this ethical aspect is being studied in detail using the method known as argument analysis by Vucetich, Burnham, Macdonald and others under the auspices of WildCRU[243]. If you believe shooting animals for sport or other purposes beyond immediate defence of life, limb and livestock, is wrong, then you will not see trophy hunting as an acceptable form of conservation, even if it is capable of being regulated in a way that brings in income, incentivises the conservation of habitat and wildlife, and increases local tolerance of lions in the face of the damage they cause to livelihoods. Rather than trying to argue with the Kantian categorical imperative – an unconditional principle that we must always follow despite any natural desires or inclinations we may have to the contrary[244] – that trophy hunting is wrong in every case, I will opt for a Bentham/Mill-style utilitarianism based on the concept of "the greatest amount of good for the greatest number"[245]. If hunting in any way assists the conservation of lions, then it is necessary to consider it as a conservation method in the absence of other more effective and sustainable choices.

Following this line of argument, the question is whether trophy hunting and related forms of consumptive, sustainable-use contribute to lion conservation or are a threat to lions. The threat, as detailed above in the examples of where trophy hunting takes place, would be from excessive or unregulated hunting that has too high an off-take, fails to prevent the over-hunting of breeding-age males or which combines with illegal killing, shooting of problem animals or the effects of snaring to threaten the survival of lion populations, or destabilises pride structures and breeding to an extent that populations are weakened and become unviable. Linked to this is the argument by some – such as the film-maker Dereck Joubert[246] and in a rather poorly focused paper by Economists at Large, commissioned by an anti-hunting NGO, on the income level from hunting[247] – that hunting does not bring in sufficient income to justify the killing of wildlife and fails to provide income and incentives that would have a greater conservation effect than eco-tourism. But many who have studied the issue believe it can play a positive role in lion conservation or, like conservationist scientists including Macdonald, Dickman, Frank, Lindsey, Loveridge, Hunter and Packer, see it as a necessary measure (or a necessary evil) in the absence of any other sustainable income-generating method that contributes to the conservation of the lion estate and so of lion populations outside protected areas. Macdonald has described the approach that needs to be taken as the contrast between the consequences of embarking on a journey rather than a sudden jump, noting that "a precipitate jump to ending lion trophy hunting might risk grave unintended consequences for the species' conservation, consequences that could be avoided by a carefully planned journey to that end"[248] presuming of course it is clear that trophy hunting is not a contributor to conservation. What is likely, though, is that some areas, like those in West Africa with small and isolated lion populations, may need to make this journey and others, where hunting appears as of now to be a useful tool, will

not necessarily need such a journey. The hunting controversy, clearly, is one that will continue to rage, involving NGOs, conservationists, wildlife departments and, to no great constructive effect, celebrities of all kinds[249].

Lindsey et al., pointing out the massive underfunding of conservation and problems associated with trophy hunting (which they cogently argue alone cannot fund lion conservation), believe that it "helps fund the operating budgets of state wildlife authorities in some countries and creates economic incentives for the retention of vast state-owned hunting blocks for wildlife," adding that trophy hunting "increases the range of conditions under which wildlife is a viable land use because photo-tourism, the primary alternative form of wildlife, is limited to areas that combine good infrastructure and abundant wildlife or spectacular scenery"[250]. Trophy hunting has provided a stimulus, as shown by the examples from Namibia, South Africa and Zimbabwe, for the rewilding of land previously used for cattle and retention of wildlife habits amid pressure on land from growing populations[251].

A problem is that, in some areas, the income particularly for local communities from hunting is limited and may over time struggle to compete with other land uses, notably the production of cash crops (as the Cameroon example in Chapter 5 demonstrates). It is also the case that in many areas the income per square kilometre from hunting falls well below the conservation, management and anti-poaching costs – Lindsey et al. recorded that typical income is only \$138–1,091/km^{2}and funding needs are \$460 to \$2,048/km^2 [252]. The contribution of hunting income may also be reduced by utilisation of the income by wildlife departments for purposes other than conservation or lost through corruption (Tanzania being a prime example). And there is a clear danger that over time, and not purely as a result of the Cecil outrage, the demand for high-cost trophy hunting will decline, as Craig Packer told me in relation to the declining demand and uptake of hunting blocks in Tanzania. The post-Cecil bans by airlines on carrying trophies and the bans by countries like Australia and France on importing lion trophies could further reduce demand, income and therefore any contribution to conservation funding. These are all serious issues but if you take away hunting income when there is no alternative then you reduce funding available for conservation while impoverishing further and creating greater grievances among people who have to coexist with lions, as happened with the hunting ban in Botswana.

In their study for the Food and Agriculture Organisation of the UN, Cooney et al. note the growing public distaste for trophy hunting outside Africa and calls by politicians in Europe and the United States for restrictions on imports of trophies. But they point out that in the bitter arguments over hunting, it is clear that anti-hunting advocates often based their calls for an end to the hunting or trophy imports "on poor information and inaccurate assumptions"[253] They conclude that "trophy hunting, if well managed, can play a positive role in supporting conservation as well as local community rights and livelihoods"[254]. Booth effectively supports this argument, rejecting the position adopted by many (Joubert

being a prime example) opposed to hunting as a means of generating income for local people and conservation, that non-consumptive safari tourism will bring in more income. Those opposing hunting argue that shooting an animal brings in immediate income but the survival of that animal attracts tourists who will pay over and over again to see an animal, so making an animal more valuable over time[255]. This approach ignores the fact that tourists come to see large numbers of animals not one particular lion, buffalo or elephant and that killing one animal does not substantially reduce numbers available for hunting or non-hunting tourists in the future. Booth details that while Southern African countries earned about $3.2 billion a year in the early 2000s from non-hunting tourism compared with $190 million for hunting (this comparison is used by those opposed to hunting to show that non-hunting tourism is a better source of income than hunting), hunting income is more likely to accrue to people at the local level and be retained nationally than earnings from other forms of wildlife tourism[256]. He also points out that trophy hunting generally takes place on land with low densities of wildlife, poor transport and accommodation infrastructure and few attractions that would bring in non-hunting tourists but do not deter hunters[257]. This argument is borne out by the experience of Botswana, with few hunting blocks becoming viable tourist areas after the 2014 ban. In areas marginal for photographic tourism, hunting can be the only viable source of income if the land is to be retained for wildlife. Hunting tourism does not support large volumes of tourists but can be the highest value land use for arid and semi-arid areas[258].

Even in popular tourist areas such as Timbavati (adjacent to Kruger NP in South Africa), the higher prices paid by each hunting tourist in comparison with other tourists means that more income is generated for reserves and conservancies that mix hunting and non-hunting tourists. Timbavati in 2016 gained three times more income from 46 hunters than from 24,000 other tourists[259]. This demonstrates the higher income per hunter and increases the power of the argument that low numbers of hunters bring in more income and would also require far less infrastructure and result in far less environmental degradation to produce value in marginal areas than large numbers of non-hunting visitors[260]. These facts undercut the arguments of those who say that photographic tourism can replace trophy hunting as a source of income. Chief Timex Moalosi in Sankuyo, Botswana, reinforced this argument, telling me in May 2018 this his community earned far more from selling hunting quotas and providing land for hunting operators than it received from other tourism, as the latter involved the income from leases going to the government not the community, making hunting a better source of income which then persuaded people to tolerate wildlife, which was not the case always with other tourism.

Hunting can damage conservation of lions, too. Poor regulation, over-hunting and inadequate monitoring of the effects of hunting on populations are all dangers. Packer et al. have pointed this out but still don't come out for a ban. They argue instead that strict setting of quotas on a scientific basis for each area and age limits to ensure that only mature males are hunted would "help ensure safe

harvest levels despite uncertainties about local population sizes"[261]. Loveridge et al., no great lovers of trophy hunting, resign themselves to the current need to retain hunting areas around protected areas, like Hwange. While noting that hunting blocks can become "sinks" with lions sucked into the vacuum created by hunting of adult males, they conclude that "if sustainably managed (with sustainable hunting quotas and rigorous monitoring), these areas, which ensure the conservation of intact natural habitat important for wildlife, hold the potential to play an important role of buffer areas around protected areas"[262]. Hunting, if managed well, can sustain the lion estate, be a buffer between lions and farming communities and bring in income that helps sustain a minimum level of tolerance for them. This can be done through mixing regulated hunting with other tourism and land uses, so that multiple benefits are derived from the wildlife and habitat. As Naidoo et al. argue, "Diversifying benefit streams from wildlife conservation so that the variety of stakeholders within local communities are incentivized to promote or at minimum tolerate living with wildlife will provide the greatest likelihood that conservation as a land use will ultimately prove more attractive than wildlife-unfriendly alternatives"[263].

This is also the message from Macdonald's post-Cecil study. He argues, while clearly not being a supporter of hunting, that, "There is little evidence that trophy hunting has substantial negative effects at a national or regional level. Where trophy hunting is well-regulated, transparent and devolves sufficient authority to the land managers, it has the potential to contribute to lion conservation." The danger to lions from hunting comes in countries with "poor governance and weak regulation [which] can lead to unsustainable trophy hunting," adding that, "The most fundamental benefit of trophy hunting to lion conservation is that it provides a financial incentive to maintain lion habitat that might otherwise be converted to non-wildlife land uses"[264]. This approach is also taken by Luke Hunter of the big cat conservation group Panthera, who argues that while he thinks "sport hunting big cats is repellent and I would welcome its demise," he is reluctantly aware that, "my personal distaste for hunting won't help lions if shutting it down removes protection from African wilderness. Whatever one's personal feeling, hunting should be regarded as yet another tool in the arsenal of options we must consider if we are to conserve the lion"[265].

What is clear, and Macdonald's post-Cecil report emphasises this, is that until more effective and sustainable means of raising income and conserving habitat is found, trophy hunting is a viable option (albeit a necessary evil for some) in many parts of the lion range. This is emphasised by the study published in November 2018 that highlights the cost of lion conservation across range states, estimating it at $1 billion a year[266], showing the dire need for income generation to protect lions in the long term. Frank argues that the ban on hunting in Kenya has contributed heavily to the decimation of Kenya's wildlife in the 40 years since, with local communities often seeing wildlife as nothing but an expensive nuisance to them, and they rightly ask why they should tolerate its costs while getting nothing in return. He believes that "A large profit is not necessary – simply

seeing some sort of financial return for tolerating wildlife makes a big difference in attitudes. Outside of the few small parks, wildlife is worthless – small wonder that KWS has totally ignored the bushmeat trade (which barely existed before the ban), does its best to ignore poisoning, and takes only rhinos and elephants seriously – that's where the money is"[267].

Postscript

It is abundantly clear from my narrative that the threat to the survival of the lion comes from people – through population growth, expansion of cultivation and pastoralism, retaliatory killings, bushmeat poaching and, in some places, industry and urban growth. Unregulated trophy hunting can also reduce numbers and threaten populations, but, in some circumstances, it is a viable way of generating income that enables habitat protection and mitigation of local grievances or material losses.

Humans evolved from being the prey of predators to being scavengers of lion kills, competitive hunters and killers of lions to protect themselves and their livestock, and for sport. The fate of lions is now in the hands of people, chiefly those who live alongside them and come into conflict with them or suffer from their presence. Public opinion outside the range states (particularly in North America and Europe) has often seemed to carry more weight in decision-making over lion conservation than the view of local people and local realities in the range states. It is time that this changed with greater attention paid to conserving lions while promoting rural development and poverty alleviation for the communities directly affected. There is not a single, simple solution that will work for all areas, as the threats and therefore solutions vary, which again emphasises the importance of local interests and input being paramount.

The loss of habitat is the overarching threat to lions. Without suitable habitat and prey to hunt, lions will simply disappear, as is now possible across West Africa and parts of Central Africa. Bushmeat poaching, encroachment on protected areas, fragmentation of lion populations and the killing of lions in retaliation for stock loss ultimately stem from and may also contribute further to habitat loss. The threats will only be removed or reduced to a level that does not threaten lion populations through the development of locally based and supported solutions that combine conservation with rural development, aid to develop more effective livestock husbandry practices and incentives to conserve and sustainably utilise wildlife – and, yes, this may mean legal, regulated hunting. Solutions, however well meaning, imposed from outside that do not empower or include the participation of the communities directly affected in decisions on conservation and land use, and that create dependence on NGOs and the charity of outsiders, will not work in the long term, even though such funding can be helpful, especially in encouraging local solutions such as improved animal husbandry, compensation schemes and the development of local initiatives (Guardians, Defenders and Long Shields, for example). I am not arguing that NGO funding is useless or should be rejected, but it must contribute to and not replace locally based, sustainable

approaches, particularly as in most lion ranges income that is or potentially could be generated to support habitat and species conservation is insufficient[268] and some form of other revenue is necessary to ensure funding that aids conservation, local community tolerance and community income generation. Local empowerment, incentivisation and income are the keys if we are not to be the generation that sees the extermination of lions in West and Central Africa and the confinement of those in the Gir Forest, East and Southern Africa to ever more isolated national parks, fenced reserves or conservancies.

Notes

1 J. du P. Bothma, Helen Suich and Anna Spenceley (2009), Extensive wildlife production on private land in South Africa, in Helen Suich, Brian Child and Anna Spenceley (Eds), *Evolution and Innovation in Wildlife Conservation*, London: Earthscan, 147–161, p. 147.
2 Paul J. Funston (2008), Conservation and management of lions in Southern Africa: status, threats, utilization and the restoration option, in Barbara Croes et al. (Eds), *Management and conservation of large carnivores in West and Central Africa. Proceedings of an international seminar on the conservation of small and hidden species CML/CEDC, 15 and 16 November 2006, Maroua, Cameroon,* eofoundation.org/wp-content/uploads/2015/03/2008-Management-and-conservation-of-large-carnivores-.... pdf, accessed 17 July 2018, 109–131, p. 111.
3 Funston, 2008, p. 111; and J. Riggio et al. (2012), The size of savannah Africa: a lion's (*Panthera leo*) view, *Biodiversity Conservation*, 22, December, 17–35, S5.
4 This view of the failings of KAZA was held strongly by senior wildlife officials to whom I have spoken in Botswana, the Kalahari Conservation Society in Botswana and experienced conservationists and wildlife researchers in Namibia, Botswana and South Africa.
5 Samuel A. Cushman et al. (2016), A multi-scale assessment of population connectivity in African lions (*Panthera leo*) in response to landscape change, *Landscape Ecology*, 31: 1337–1353, p. 1337.
6 Ibid., pp. 1338–9.
7 Cushman et al., 2016, p. 1349.
8 Ibid.
9 Samuel A. Cushman, Nicholas B. Elliot, Dominik Bauer, Kristina Kesch, Laila Bahaa-el-din, Helen Bothwell, et al. (2018), Prioritizing core areas, corridors and conflict hotspots for lion conservation in southern Africa, *PLoS ONE*, 13, 7, 5 July.
10 Ibid.
11 See, V.L.A. Williams, A.J. Loveridge, D.J. Newton and D.W. Macdonald (2017), A roaring trade? The legal trade in *Panthera leo* bones from Africa to East-Southeast Asia, *PLoS ONE*, 12, 10: e0185996.
12 For a fuller version of this story see Keith Somerville (2016), *Ivory. Power and Poaching in Africa*, London: Hurst, pp. 172–76.
13 J. Pearce (2018), From rebellion to opposition: UNITA's social engagement in post-war Angola, *Government and Opposition: An International Journal of Comparative Politics*, X, 1–16, p. 10.
14 Brian J. Huntley (2017), *Wildlife at War in Angola. The Rise and Fall of an African Eden*, Pretoria: Protea Book House, pp. 11–12.
15 Ibid., p. 24.
16 P. Chardonnet (Ed.) (2002), Conservation of the African lion: contribution to a status survey, International Foundation for the Conservation of Wildlife, France, and Conservation Force, USA.

Trophy Hunting in the Spotlight: to ban or not to ban?

by SULi | Jul 9, 2020 | Uncategorised | 0 comments

This week marked 5 years since "Cecil the Lion" was hunted in Zimbabwe. As a result there has been increasing media attention to trophy hunting – largely calls from animal rights organisations for it to be banned (see for example https://www.bornfree.org.uk/ban-trophy-hunting).

SULi recognises that poorly regulated trophy hunting can be a threat to local populations of some species. And indeed the IUCN Red List points to this danger for lions and leopards in particular. However, the Red List also highlights that trophy hunting is not a major threat to any hunted species at the global level – the major threats are habitat loss, human wildlife conflict, prey base depletions and poaching. Trophy hunting has also demonstrated proven conservation value for many species, through protecting habitat and incentivising landowners to protect (or at least tolerate) hunted species. There is a danger that removing trophy hunting, without providing a viable alternative revenue stream, could actually exacerbate these far larger threats rather than improve the conservation status of hunted species.

SULi member Amy Dickman, director of the Ruaha Carnivore Project, discusses these issues in a recent Mongabay podcast, along with Maxi Louis from the Namibian Association of CBNRM Support Organisations (NACSO) and Iris Ho from Humane Society International: https://news.mongabay.com/2020/07/podcast-five-years-after-the-death-of-cecil-the-lion-trophy-hunting-debate-rages-on/

The UK Government is currently considering a ban on the imports of hunting trophies. Dilys Roe and Amy Dickman recently discussed the implications of this ban with the All Party Parliamentary Group on Shooting and Conservation. You can view the presentation here: https://www.slideshare.net/IIEDslides/informing-the-debate-on-trophy-hunting

Our recommendations to the UK Government remain the same as those set out in a briefing paper SULi produced on behalf of IUCN in 2016 when the banning of trophy hunting imports was first discussed. This recommended that any decisions that could restrict or end trophy hunting programmes are:

1. based on careful and sound analysis and understanding of the particular role that trophy hunting programmes are playing in relation to conservation efforts at all levels in source countries, including their contribution to livelihoods in specific affected communities;
2. based on meaningful and equitable consultation with affected range state governments and indigenous peoples and local communities and do not undermine local approaches to conservation;
3. taken only after exploration of other options for engaging with relevant countries to change poor practice and promote improved standards of governance and management of hunting;
4. taken only after identification and implementation of feasible, fully funded and sustainable alternatives to hunting that respect indigenous and local community rights and livelihoods and deliver equal or greater incentives for conservation over the long term.

What is IUCN's position on trophy hunting?

IUCN does not have a specific policy position on trophy hunting. However the following policy positions are directly relevant to trophy hunting.

1. IUCN's position is that "use of wild living resources, if sustainable, is an important conservation tool because the social and economic benefits derived from such use provide incentives for people to conserve them" as outlined in IUCN's Policy Statement on Sustainable Use of Wild Living Resources, adopted by IUCN Members at the 2nd World Conservation Congress in Amman in October 2000. It recognises that "trophy hunting can be a form of sustainable use, and if conducted according to the Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives developed by the Species Survival Commission (SSC), can provide positive benefits for conservation"
2. IUCN "supports the philosophy and practice that on state, communal and privately-owned land in southern Africa the sustainable and well-managed consumptive use of wildlife makes a contribution to biodiversity conservation", and "accepts that well-managed recreational hunting has a role in the managed sustainable consumptive use of wildlife populations," (Recommendation 3.093, adopted by IUCN Members at the 3rd World Conservation Congress in Bangkok in November 2004)
3. IUCN does not support moving species outside their native ranges for the primary purpose of trophy hunting – as set out in its Position Statement on Translocation of Living Organisms. Recommendation 3.093 above also condemns "the killing of animals in enclosures or where they do not exist as free-ranging."

Different Commissions and Specialist Groups within IUCN do, however, have very different opinions on hunting:

- The IUCN SSC considers that trophy hunting, is likely to contribute to conservation and to the equitable sharing of the benefits of use of natural resources when programmes incorporate the following five components: (1) Biological Sustainability, (2) Net Conservation Benefit; (3) Socio-Economic-Cultural Benefit; (4) Adaptive Management: Planning, Monitoring, and Reporting; and (5) Accountable and Effective Governance (https://portals.iucn.org/library/sites/library/files/documents/Rep-2012-007.pdf).
- The Caprinae Specialist Group of the Species Survival Commission adopted a formal position statement in December, 2000, recognizing that hunting, and in particular trophy hunting, can form a major component in conservation programmes for wild sheep and goats (http://marco.recherche.usherbrooke.ca/thunt.htm)
- The Ethics Specialist Group of the World Commission on Environmental Law (WCEL) published an opinion in 2017 (re-posted in 2019 and misconstrued as a new IUCN report by many). This was one of several contrasting positions presented to an IUCN Council meeting in 2017.

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Ruaha Carnivore Project
July 2 ·

Yesterday was the 5th anniversary of the killing of 'Cecil' the lion, an event which caused massive international outrage and huge pressure to ban trophy hunting. It has also led to extensive incorrect reporting about the extent and causes of lion decline. As a project, we are extremely committed to lion conservation, and want to do all we can to minimise wildlife killings.

However, it is very important to note that while it can have negative impacts on some populations, trophy hunting is NOT a major threat to lion persistence - they key threats are loss of habitat & wild prey, and conflict with people. Unfortunately, there are simply no viable alternatives for trophy hunting in most of the areas they protect (which cover more lion range than National Parks). Removing hunting without better alternatives will make hunting areas financially less viable, hugely increasing the far greater major threats of land conversion, prey loss and conflict.

We completely understand that people feel sickened by trophy hunting. However, people should also feel sickened by the deaths through poisoning, snaring etc, which affect far more species than lions. Below, we show just a tiny sample of images, showing what happens in an area when wildlife has no tangible value to local stakeholders. None of these animals had names, but their deaths are just as real and horrible as the killing of Cecil. They are also far more damaging to conservation, as they involve females (often pregnant or lactating) and young animals, rather than the older males usually killed in trophy hunting. The images may be distressing, but please don't look away - this is the reality that we deal with on the ground, and involves real consequences that we all should consider.

Therefore, we urge people to take the time to understand and consider this issue more deeply. Removing a minor threat only to amplify far greater threats cannot be the way forwards. Instead, we need to accurately understand the causes of wildlife decline, develop viable solutions before hunting is removed, and work long-term with all stakeholders (prioritising the needs of local communities) to really deliver a better future for both people and wildlife.

Natural storytelling

Trophy Hunting – a complex picture

July 9, 2020 hughwebsterauthor

Like Professor David Macdonald with Cecil, I once had a study animal shot by hunters. The leopard – known to us as Wilbur – was a remarkably relaxed cat. The first time I encountered him, he materialised out of a wall of apple leaf scrub and walked right up to my open Land Rover without a care in the world, brushing along the side of my parked vehicle while I held my breath. Leopards can be like that – either so shy that they disappear long before you get close, or so bold that they appear fearless.

This was nearly ten years ago now, but I still remember the shock, pain and anger we all felt when word filtered through to us at our research camp that Wilbur – by then fitted with an orange VHF tracking collar – had been shot by a hunter. Losing a study animal can feel a bit like losing a much-loved pet. Scientists are supposed to remain dispassionate observers, but when you spend hundreds of hours alone in the company of a wild animal you get to know its individual character and inevitably a bond forms; you become invested in that animal's fate. While a respectful distance distinguishes this relationship from the sort one might enjoy with a domestic animal, the wild animal's death is still mourned – especially when its death has only served to furnish some sad individual with a pathetic trophy.

We soon learned that the hunter had been sitting in a hide with his professional guide, staking out a bait they were using to attract leopards. This is how leopards are shot, from a stable position, in cover, and at short range, with the big cat lured to its death. It is like shooting fish in a barrel. In the gloaming, the hunter and his guide claimed not to have seen the orange collar around Wilbur's neck. I have always found that hard to believe. Collars are very obvious on leopards, contrasting noticeably with the surrounding spotted fur and sitting proud of their short coats. I suspect that Wilbur was just too fine a specimen to pass up. Under time pressure, with a client having paid thousands of dollars for his trophy, I believe the professional guide chose not to see the collar and sanctioned the shot, but I can never know for sure.

Whatever the truth of Wilbur's death, the hunter and his professional guide left the country shortly after this incident, and not long after that hunting was suspended in Botswana. The hunter had been entitled to shoot a leopard in that area, but the established code of practice was and is for hunters to avoid shooting collared research animals, partly out of courtesy and partly because the good hunters genuinely value conservation and the insights these collars give everyone with an interest in managing and conserving wildlife.

Today, Botswana is slowly opening up its hunting industry again, attracting vocal criticism from animal rights campaigners and celebrities. Their campaign strikes a chord with many for whom the images of overweight and inanely grinning hunters posing proudly next to recently butchered wild animals in their physical prime are repugnant. The "sport" favoured by Donald Trump Junior and the King of Spain is seemingly indefensible, but should it be banned?

Perhaps surprisingly, there are few conservation scientists endorsing these popular calls for a ban. Instead, many are alarmed at what a ban might mean for the threatened species they have dedicated their lives to protecting. Why is this? When so many conservation biologists are disgusted by trophy hunting, and when some of us have lost well-loved study animals to hunters' bullets, why are we reluctant to support a ban?

The truth is that trophy hunting is not the main threat facing wild animals in Africa. For most species it is not a threat of any sort. In fact, the opposite is true – trophy hunting provides a means of funding and therefore protecting the habitats that sustain populations of wild animals across large swathes of the continent where, without hunters' dollars, wild bush country would soon be taken over by agriculture. Across many of Africa's prime safari destination countries, the area of land managed for hunting is equal to or larger than the area set aside for photo tourism in national parks. This is why lions are actually increasing in Southern Africa where they are legally hunted, while their population has crashed in countries like Kenya where trophy hunting is already banned. Ditto giraffes. Ditto Rhinos. Ditto elephants… But if we banned hunting, the area of land protected for wildlife could shrink drastically.

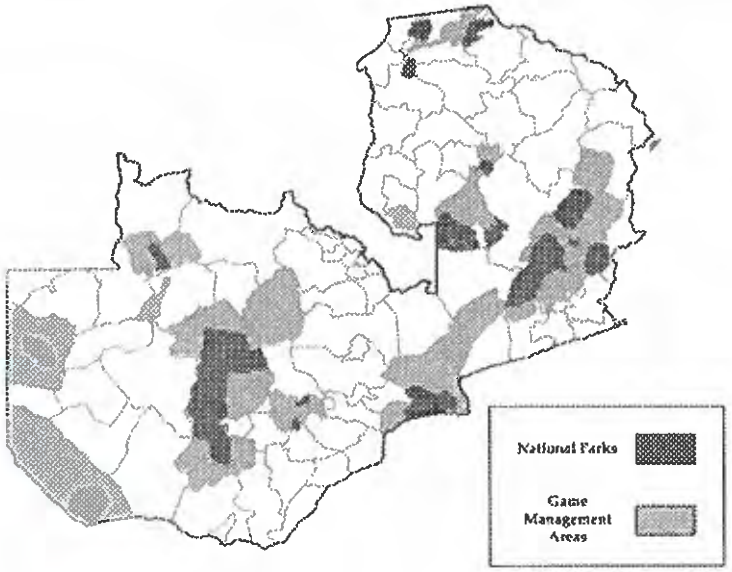

Fig.1 Map of Zambia showing the land area protected within national parks and the area designated as Game Management Areas, hunting zones which buffer the core national park network and provide local communities with invaluable income (Subakanya et al 2018).

Fig.2 Map of Zimbabwe showing the far greater extent of areas designated for hunting versus non-hunting areas (Njerekai 2016).

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Impacts of a trophy hunting ban on private land conservation in South African biodiversity hotspots

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Abstract

Private land conservation areas (PLCAs) have become critical for achieving global conservation goals, but we lack understanding of how and when these areas respond to global pressures and opportunities. In southern Africa, where many PLCAs rely on trophy hunting as an income-generating strategy, a potential ban on trophy hunting locally or abroad holds unknown consequences for the future conservation of these lands. In this study, we investigate the consequences of a potential trophy hunting ban in PLCAs in two biodiversity hotspots in South Africa's Eastern and Western Cape provinces. We used semistructured interviews with PLCA managers and owners to elicit perceived impacts of an internationally imposed trophy hunting ban on conservation activities in PLCAs, and to probe alternative viable land uses. The majority of interviewees believed that both the economic viability of their PLCA and biodiversity would be lost following a hunting ban. Owners would primarily con-

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constrained by the social ecological context of their PLCA (e.g., competition with other PLCAs, ecological viability of farming). Our results suggest that a trophy hunting ban may have many unintended consequences for biodiversity conservation, national economies, and the livelihoods of PLCA owners and employees. Along with similar social-ecological studies in other areas and contexts, our work can inform policy decisions around global trophy hunting regulation.

KEYWORDS
biodiversity conservation, land use change, other effective area-based conservation measures, protected areas, resilience, social-ecological systems

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1 | INTRODUCTION

Protected areas (PAs) are considered a core strategy for protecting biodiversity (Chape, Harrison, Spalding, & Lysenko, 2005; Watson, Dudley, Segan, & Hockings, 2014). Recognizing that conservation goals cannot be reached by state-owned PAs alone, governments and conservation planners are increasingly looking to private land conservation areas (PLCAs) as a strategy to achieve national and global conservation targets (Mitchell et al., 2018; Stolton et al., 2014). In addition to offering cost-effective expansion of the conservation estate (De Vos & Cumming, 2019; Stolton et al., 2014), PLCAs also offer opportunities for protecting threatened and underrepresented habitats (Clements, Kerley, Cumming, De Vos, & Cook, 2019; De Vos & Cumming, 2019; Gallo, Pasquini, Reyers, & Cowling, 2009), curbing losses in natural land cover (Shumba et al., 2020), and increasing the connectivity of PA networks (De Vos & Cumming, 2019).

The capacity of both state-owned PAs and PLCAs to achieve their conservation objectives is dependent on their ability to continue funding their management activities (Di Minin & Toivonen, 2015; Watson et al., 2014). In many countries, government funding of state-owned PA management is either absent or insufficient (Di Minin & Toivonen, 2015), leaving PAs vulnerable to threats such as human encroachment, poaching, mining, and illegal resource use (Golden Kroner et al., 2019; Lindsey et al., 2014). PAs employ various financing strategies to

Williams, & Bradshaw, 2016; Lindsey, Balme, Funston, Henschel, & Hunter, 2016). Proponents of trophy hunting assert its importance as a conservation tool that, in addition to funding state PAs, offers incentives for conservation-based land uses to communities and private landholders, with positive outcomes for biodiversity and people (Cooney et al., 2017; Dickman, Packer, Johnson, & Macdonald, 2018; Frost & Bond, 2008; Lindsey et al., 2016; Naidoo et al., 2016). Trophy hunting of the big five species generates high revenues in a number of African countries (Di Minin et al., 2016; Frost & Bond, 2008). However, opponents object to the practice on moral grounds (Batavia et al., 2019), as well as often questioning the conservation and community benefits (Ripple, Newsome, & Kerley, 2016), and sustainability (Schulze et al., 2018) of the global trophy hunting industry. Renewed public interest after the infamous killing of a male lion in Zimbabwe, affectionately known as Cecil, by a wealthy American hunter in July 2015 has increased global pressure for the practice to be banned in Africa (Di Minin et al., 2016; Dickman et al., 2018; Lindsey et al., 2016). This is evidenced by the implementation of trophy import bans and several petitions being launched against the practice by the United States and other western nations (Di Minin et al., 2016; Lindsey et al., 2016), as well as bans and restrictions on transport of trophies by numerous airlines (Di Minin et al., 2016).

At present, global policy around trophy hunting is more informed by public pressure than by research and science (Bauer, Vasile, & Mondini, 2017; Dickman

wildlife trade, bush meat sales and trophy hunting (Emerton et al., 2006). In southern Africa, wildlife-based land uses (such as hunting and ecotourism) have emerged as a financially viable alternative to farming, particularly in more marginal areas, due largely to legislation that enables private landholders to own and benefit commercially from wildlife (Child, Musengezi, Parent, & Child, 2012). Thus, a large network of PLCAs has emerged. In South Africa, PLCAs cover over double the land area covered by state PAs (Taylor, Lindsey, Nicholson, Relton, & Davies-Mostert, 2020), and for the most part receive no government funding or legal protection (but see De Vos & Cumming, 2019). Many of these PLCAs rely strongly on revenues generated from trophy hunting (Taylor et al., 2020).

Trophy hunting, particularly of iconic species such as the "big five" (lion, *Panthera leo*, elephant, *Loxodonta africana*, rhino, *Ceratotherium simum* and *Diceros bicornis*, leopard, *Panthera pardus*, buffalo, *Syncerus caffer*), remains a particularly controversial and polarizing form of consumptive wildlife use (Di Minin, Leader-Williams, & Bradshaw, 2016). Some have argued for effectively ending trophy hunting in the not-too-distant-future regardless of the scientific evidence regarding its contribution to conservation objectives (Lindsey et al., 2016; Macdonald et al., 2017). The mechanisms through which an effective ending of trophy hunting could be achieved is through outright bans, or losing its financial viability due to trophy import bans or lack of international markets (Fears, 2017; Lindsey, Balme, Booth, & Midlane, 2012).

If trophy hunting is banned, there remain large knowledge gaps about the potential implications for conservation areas that rely on revenue generated through trophy hunting (Macdonald et al., 2017; Naidoo et al., 2016). Several studies have reported negative outcomes for both people and biodiversity from past hunting bans in African countries (Di Minin et al., 2016; Mabeta, Mweemba, & Mwitwa, 2018), while some have also investigated the impact of potential future bans, particularly for trophy hunting. Naidoo et al. (2016) demonstrated negative impacts for livelihoods and biodiversity in communal conservancies in Namibia in a simulated trophy hunting ban, and another recent Namibian-

focused study (Angula et al., 2018), identified widespread resistance to a hypothetical trophy hunting ban from rural communities, citing negative impacts on people's livelihoods. However, the implications of a potential trophy hunting ban on PLCAs, and how landowners would adapt to it, has not, to our knowledge, received any scholarly attention. One might expect that if, due to a trophy hunting ban, wildlife-based land uses are no longer a financially viable option, PLCA landholders may change land use (for example to livestock farming or cultivation), with consequences for biodiversity and livelihoods.

In this study, we investigate the perceived impacts of an internationally- or locally-imposed trophy hunting ban on the ability of PLCAs to retain conservation-based land uses in South Africa. We focus on South Africa because the country boasts one of the largest trophy hunting industries in sub-Saharan Africa (Lindsey, Alexander, Mills, Romañach, & Woodroffe, 2007; Taylor et al., 2020), with the majority of it being practiced on privately-owned land (Nelson et al., 2013). Trophy hunting generates an estimated at R1.96 billion per year (approximately USD130 million in February 2020), and a trophy hunting ban may thus have particularly widespread consequences for conservation-based land uses and livelihoods. We interviewed PLCA owners and managers in South Africa's Eastern and Western Cape provinces to assess the role that trophy hunting currently plays in the financial sustainability of PLCAs. We subsequently conducted further interviews with owners and managers of properties offering trophy hunting to understand their perceptions regarding

funding or management support from the state (Cadman, 2010; Taylor et al., 2020). In the last few decades, the PLCA network in South Africa, and the informally-protected network in particular, has seen substantial growth largely as a result of economic drivers such as reduction in agricultural subsidies and opening of tourism markets (Child et al., 2012; Taylor et al., 2020). The contribution of informally-PAs to conservation is under-studied and somewhat controversial, as some of these farms may not adhere to practices that align with good environmental management, through for example over-stocking large mammals and introducing extralimital species (Castley, Boshoff, & Kerley, 2001; Cousins, Sadler, & Evans, 2010; Spear & Chown, 2009). On the other hand, many informal-PAs generate substantial income for conservation (through, for example, hunting permits that subsidize conservation outside of their boundaries Taylor et al., 2020), are effective at protecting natural land cover (Shumba et al., 2020), and conserve threatened biodiversity that is underrepresented in state PAs (Gallo et al., 2009). PLCAs that have been formally gazetted (and better studied) have been shown to play a critical role in improving habitat connectivity (Clements et al., 2019; De Vos & Cumming, 2019), conserving under-protected and threatened habitats (De Vos & Cumming, 2019), and protecting complimentary biodiversity to that on state-owned PAs (Gallo et al., 2009). The PLCA network is also spatially expansive, with informally-PAs comprising at least 14% of South Africa's land area; more than double that covered by state-owned PAs (Taylor et al., 2020).

changes they would employ in the event of such a ban, and what they perceive the consequences would be for biodiversity conservation.

2 | METHODS

2.1 | Study area

Private land plays an important role in South African conservation (De Vos & Cumming, 2019; DEA & SANBI, 2009). South African PLCAs include private nature reserves, which are legally gazetted under the Protected Areas Act (Act 57, 2003); biodiversity agreements, which have legal status by virtue of a legally binding contract; and informally protected conservation areas, which are not legally recognized but receive some form of protection by the landholders and are managed at least partly for biodiversity conservation (Cadman, 2010). The majority of trophy hunting occurs on informally protected PLCAs, which receive no

(dried meat) hunting, game meat production, and game sales. Trophy hunting is a major contributor to the wildlife ranching economy, generating R1.96 billion (USD127 million, March 2020) compared to the R0.65 billion (USD42 million) generated by biltong hunting, 0.16 billion (USD10.5 million) from game meat production, but smaller than the R4.32 billion (USD281 million) generated through live game sales (Taylor et al., 2020). Of the revenue generated by trophy hunting, the biggest proportion (47.1% in the Taylor et al., 2020 assessment) is estimated to go to the landowner through species fees. Additionally, landowners often (but not always) generate income from accommodation, meat processing and trophy handling. Other revenue is generated from paying guides and trackers, permits (thus supporting broader conservation activities) or private operators (such as professional hunters, transport agencies or intermediaries).

This study focused on PLCAs within the Eastern and Western Cape provinces of South Africa. The Eastern Cape province spans 169,000 km^2 and although it is one of the poorest provinces in the country it is extremely rich in

biodiversity, encompassing all three of South Africa's global biodiversity hotspots (Myers, Mittermeier, Mittermeier, Da Fonseca, & Kent, 2000). The Western Cape province spans 130,000 km^2 and contains two internationally recognized biodiversity hotspots (Myers et al., 2000). We focused our study on these two provinces because they contain both biodiversity hotspots and a large number and variety of PLCAs. Wildlife-based conservation is expanding in this region (Clements, Baum, & Cumming, 2016; Gallo et al., 2009; Selinske, Coetzee, Purnell, & Knight, 2015) and over a quarter of the priority areas identified by South Africa's Biodiversity Economy Strategy are located in these provinces (DEA, 2015).

2.2 | Data collection

To assess the extent to which PLCAs depend on trophy hunting for revenue, data on the revenues derived from trophy hunting during the 2013/2014 financial year were collected via semistructured interviews with the owners and/or managers (hereafter "landholders") of 72 randomly selected PLCAs, as part of a larger research program between 2014 and 2015 (Clements, 2016). These properties varied in size from 0.1 to 543.8 km^2 (mean 53.9 km^2), and conserve seven of South Africa's nine biomes (forest, fynbos, grassland, Nama karoo, thicket, savanna, and succulent karoo) (Clements, 2016). Trophy hunting revenues reported in South African Rands were converted to United States Dollars using an average of interview lasted between 30 and 45 min on average, with most interviews being conducted face-to-face, or alternatively via Skype. The questions posed to the landholders were open-ended and related to why the landholder undertakes trophy hunting, and the perceived impacts of an international trophy hunting ban to their PLCA's economic viability and biodiversity conservation objectives (Supporting Information Appendix S1). Landholders were also asked about possible coping strategies that they would implement in response to losing economic viability in the face of a trophy hunting ban, and constraints on transitioning to commonly mentioned alternative land uses. All participants consented to being audio recorded during the interview sessions and these recordings were later transcribed.

2.3 | Data analysis

We used data from the first round of interviews ($n = 72$) to calculate the proportion of landholders that relied on trophy hunting, as a fraction of their total revenue, and in the context of other activities that contributed to their overall income.

Data from the second round of interviews ($n = 22$) were analyzed by way of thematic coding, using the RQDA package in R (R Development Core Team, 2016). Codes (words or phrases representing a single idea) were identified and, based on critical reading of the transcribed interviews, allocated into broader themes (Aronson, 1995).

gain insight into landowners' perceptions regarding the likely impact of a trophy hunting ban, we then undertook follow-up interviews in 2018 with the landholders of PLCAs that generate revenues from trophy hunting. As only 11 of the originally interviewed landholders were available for a follow-up interview, we augmented the sample by using snowball sampling (Newing, Eagle, Puri, & Watson, 2010). Interviews were undertaken with the landholders of 11 additional PLCAs that undertake trophy hunting. A total of 22 landholders were thus interviewed in 2018, 13 from the Eastern Cape and nine from the Western Cape province. The study adhered to Rhodes University's ethics policy (approval no.: ES18/11).

In the first round of interviews (2014/2015; $n = 72$), landholders were asked, in face-to-face interviews as part of a larger survey, what their total revenue was for the 2013/2014 financial year, and the proportion that was derived from trophy hunting, and other activities (e.g., ecotourism, live sales) (see Clements, 2016) for full description of methods and a copy of the questionnaire). In the second round of interviews (2018; $n = 22$), each phy hunting ban to PLCA economic viability, coping strategies and biodiversity conservation.

To investigate if there were particular groups among the landholders who were more or less inclined to retain wildlife-based activities and land uses in the face of a ban, a Principal Component Analysis was performed to identify trends in the coping strategy themes mentioned by landholders (R package: vegan; function: rda) (Oksanen et al., 2015). Thereafter, we performed a cluster analysis to identify distinct groups by employing Euclidean distance and Ward linkages (R packages: vegan and stats; functions: vegdist and hclust) (Oksanen et al., 2015; Ward, 1963). We used a Mantel-based comparison to determine the number of distinct clusters (R package: cluster; functions: daisy and silhouette) (Maechler et al., 2015).

3 | RESULTS

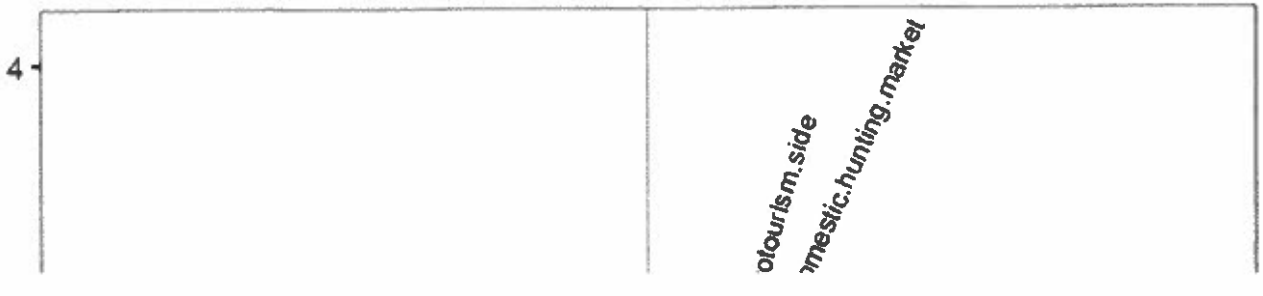
Of the random sample of 72 PLCA landholders interviewed from 2014 to 2015, slightly under a third (32%)

generated revenues from trophy hunting. Of those that undertook trophy hunting, revenues from this activity comprised, on average, 36% of their total annual revenue, though there was a considerable range (SD = 32%, minimum = 4%, maximum = 95%, n = 72). The non-trophy-hunting revenues were generated through ecotourism (32% of revenue on average), live game sales (15%), hunting for meat ("biltong" hunting) (12%), farming (2%) or events (1%), and other (2%) annual revenues from trophy hunting ranged from US$756 to US$600,000 (average = US$71,168, SD = US$136,179). Taken together, wildlife-based revenues thus comprised 95% of annual revenue, on average, while nonwildlife revenues (farming, events) comprised 5%.

More in-depth interviews with the landholders of 22 trophy hunting PLCAs in 2018 revealed that all landholders practiced trophy hunting for economic reasons, for example stating that "*Trophy hunting is definitely the aspect that brings in the most money.*" Two thirds of landholders also mentioned conservation reasons, for example "*I have actively been involved in the game breeding side, the game lodging side, the professional hunting side, the tourism and marketing side and I have never seen an environment that is so turnkey in articulating a gross conservation impact than hunting has.*" Half of landholders mentioned passion as a reason; "*I obviously have an interest and a passion in wildlife and for me it is a bit of a personal thing.*" For many landholders, these three main reasons were intertwined. For example, one landholder stated that they practice trophy hunting "*For conservation and obviously so it's viable for us financially. As a business we do it and because we enjoy it and we do what we love.*"

The majority of trophy hunting clientele were from the US, Canada and the European Union; 95% of landholders mentioned these three regions, while 45% mentioned other international countries. Just over half of landholders (55%) also received clientele from South Africa.

The majority (91%) of landholders believed that a trophy hunting ban would have a major negative impact on the economic viability of their properties. One landholder explained that "*It would be colossal... a trophy ban would take out 50% of our income which although only 50% of our market it is probably 70% of our turnover. It comes*



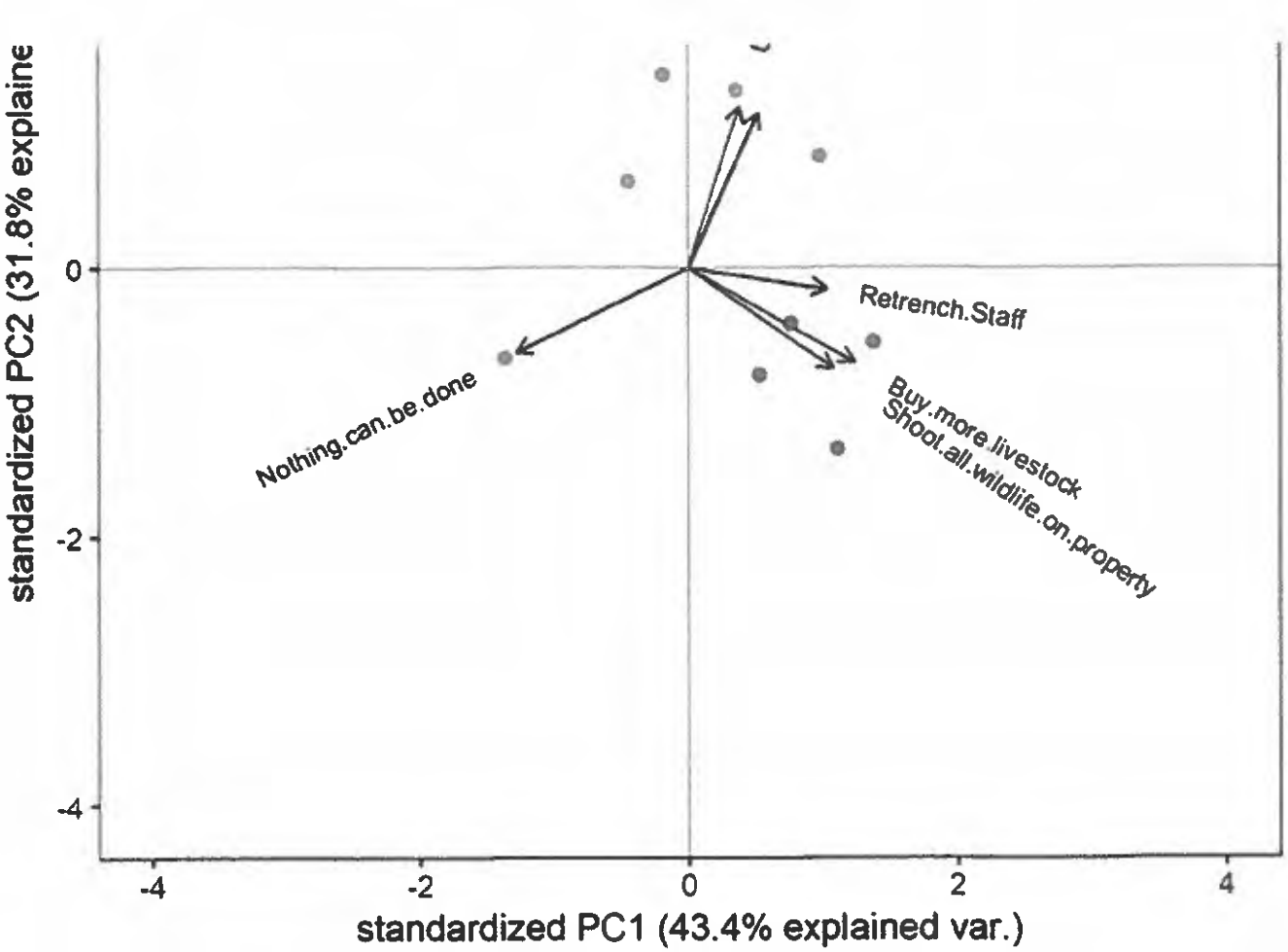


FIGURE 1 Biplot depicting the relative scores, on the first two principal components (PC), of possible coping strategies in response to a trophy hunting ban, as mentioned by the landholders of private land conservation areas (PLCAs). Data points indicate PLCA scores, with colors corresponding to three identified clusters

TABLE 1 Perceptions of 22 landholders regarding the constraints on transitioning to an alternative land use in the face of a trophy hunting ban

Alternative land use	Constraints on adopting the land use	Percent land-holders	Supporting quote
Ecotourism	Increased input costs associated with tourist infrastructure, employing more staff, marketing, water and electricity	55%	*"The cost involved from changing from trophy hunting to ecotourism is extremely high"* *"We would have to employ more managers and employ more staff. We would have to improve certain vehicles, we would have to spend more money on better lodges and that sort of thing"*
	Market is saturated, competition is too high	40%	*"It's a flooded market. There are so many places around us doing it"* *"The ecotourism market is oversaturated and are struggling at the moment to put bums in beds"*
	Ecotourists demand higher standards than hunters for food, accommodation and big five experience	32%	*"Your foreign ecotourists they all want to see the Big five and then most of them are looking for five-star accommodation"*
	Less profitable than trophy hunting	27%	*"There is more limited turnover in ecotourism"*
	Requires more customers than trophy hunting	18%	*"You would need 30 times the amount of people doing tourism than you would in hunting"*
	Too far from market	9%	*"Not here I can tell you the boat won't float. We are too far off the main tourist routes. There's little tourist attraction here"*
Livestock farming	Marginal land	45%	*"Our property was run as a livestock farm previously, but it was heavily impacted, you must understand the terrain, its cliff faces. So, it's huge valleys, there's no other real land-use that would survive in that area other than hunting"* *"Where we live is marginal land, it can't be used for much else"*

Increased input costs associated with infrastructure for livestock	27%	*"If I had to re-fence the farm it would cost me over 10 million so economically, I don't think it would be viable to go back into stock farming"* *"Alternatively start domestic farming with livestock, but the capital to start that would be massive. All the refencing everything, recamping the whole property, infrastructure to work the animals"*
Predators, pests and diseases	18%	*"You could do livestock, but it will be very difficult to keep stock with all the predators around here"* *"We have tick-borne diseases here and the game are just much more well-adapted than the stock"*
Stock theft	9%	*"Stock farming here was just not profitable because of things like stock theft"*
Property too small	9%	*"Too small to have as a single-standing stock farm so I could sell it to other farmers in the area and they would expand it and integrate into their bigger setup"*

back to the per capita return on animals." By contrast, the remaining 9% of landholders stated that a ban trophy hunting would not impact their viability; "*Hunting is just a part of what the farm does. It is about a tenth of what we bring in, so it wouldn't really impact our financial viability that much.*"

Based on their opinions and perceptions, three clusters of landholders emerged, with distinct coping strategies in the event of a trophy hunting ban impacting their economic viability (Figure 1; Mantel score = 0.78). The first group (pink cluster; 36% of landholders) was characterized by landholders who would transition to or scale-up other wildlife-based land uses such as wildlife utilization (live sale or hunting for meat) or ecotourism. For example, "*I would assume that we would migrate over to ecotourism and get the big 5 in. It would affect the farm a lot. It would impact particularly in winter months as we would have to sell more live game and have more visitors come.*"

The second group (green cluster; 36% of landholders) was characterized by landholders who would abandon a wildlife-based land use, and transition to livestock (Figure 1). These landholders also commonly mentioned that they would shoot all the wildlife on the property and retrench staff. One landholder stated that "*I think what we would probably have to do is first retrench our staff for the meantime and then look at the viability in terms of livestock farming. We can't do crop farming here because we don't have enough water and that sort of thing. The only other thing we could do is domestic livestock.*" included the property being too marginal and/or small, increased input costs, predators, pests, diseases and stock theft (Table 1).

The vast majority (95%) of landholders believed that a trophy hunting ban would have a negative impact on biodiversity conservation, mentioning likely declines in wildlife numbers, losses in wildlife value (related to live animal sales), damage to ecosystems, negative impacts on wildlife genetics and increased poaching (Table 2). One landholder, however, had a contradictory view, and believed that a ban would be good for conservation, stating that "*The animals would be able to live out their full lives, pass on genes properly, die when they are meant to die. Vultures and other scavengers would possibly emerge and live off carcasses.*"

4 | DISCUSSION

Trophy hunting is an important financial strategy for the viability of PLCAs in South Africa: a third of surveyed PLCAs generated at least a portion of their revenues from trophy hunting, and nearly all landholders who offered trophy hunting felt that it was important to their overall viability. This study is, to our knowledge, the first investigation of the possible impacts of a trophy-hunting ban that focuses specifically on single-landowner PLCAs. It shows that the impact of a trophy hunting ban on the financial viability of PLCAs in South Africa could be significant and lead to land use change on many PLCAs. Our results have important implications for the future of

that nothing could be done to remain economically viable following a ban or had no interest in pursuing another land use (Figure 1). These landholders stated that they would likely sell their property in the event of a ban. According to one landholder, "*Economically [trophy] hunting has changed the game for us and to go back to anything else would just not be feasible for us. We only have 3500 hectares which isn't a lot of land,*" while another stated that "*I would sell immediately. There is zero interest for me in doing anything other than this, it is my biggest love and passion. I think honestly if there was a trophy hunting ban, I would sell the farm there's just no doubt about it.*"

Perceived challenges to transitioning to or scaling up ecotourism in the face of a trophy hunting ban included increased input costs, a saturated market, ecotourists demanding higher standards than hunters, ecotourism being less profitable and requiring greater volumes of customers than trophy hunting, and some properties being too far off the main tourist routes (Table 1). Perceived challenges to transitioning to livestock farming

4.1 | Implications for land use

Our results showed that the majority of landholders with wildlife-based PLCAs (63%) would move away from a wildlife-based land use. This is somewhat in line with the findings of Angula et al. (2018), who showed that only 11% of surveyed Namibian conservancy residents would continue to support wildlife on communal land in the event of a trophy hunting ban, and that of Naidoo et al. (2016), who found that a simulated ban on trophy hunting significantly reduced the number of conservancies who could cover their operating costs.

In our study, only a third of landholders felt that they could scale up or adopt other wildlife-based land uses (i.e., ecotourism) to cover the financial deficit created by a trophy hunting ban. Biophysical constraints, such as being too far from the tourist routes, are commonly mentioned as the main constraint to upscaling ecotourism (Mgonja, Sirima, & Mkumbo, 2015; Pegas &

TABLE 2 Perceptions of 22 landholders regarding the impact of a trophy hunting ban on wildlife and ecosystems

Impact	Percent land-holders	Supporting quote
Decline in wildlife numbers	82%	*"I believe African wildlife wouldn't survive without trophy hunting because you have got to breed 4 or 5 animals to make a cent so that's conservation itself. And so, the trophy hunter is what drives this whole industry, without him at the top the whole industry collapses"* *"This is pretty much the precipice of the conservation front for wildlife at the moment and without it, everything would collapse. Animal numbers, I reckon, would drop below 25% throughout the country"* *"For a start, what we do now on our property is that based on the size of our property we can scientifically work out how many animals there should be on property. It is stocked on line on browsing/grazing capacity. So, we would have to cull game to make way for stock. The wild animals at the moment would be competition for stock farmers"*
Loss in wildlife value	68%	*"When you remove trophy hunting from the equation, if you remove that well it has no value. What are you breeding for? The underlying market value of a stud is the hunting exit strategy market value and if that falls to the wayside you lose the value of the stud"* *"The animals will lose value then and if the farmer sees no value for the wild animals on his property, he will either get rid of all of them or put less effort into them"*
Damage to ecosystems	68%	*"If you have a game farm or a game reserve your ecosystem is more in balance just on type of bushes and shrubs that you get here. You get many more 5-star grazing units on a game farm when it is stocked correctly"* *"If you look at Kruger or the Tuli Block for example they didn't do any hunting there and they decimated all the vegetation to such a degree that they all started saying of starvation and a break out of anthrax and killed all the animals indiscriminately. We are in the privileged positions as humans that if you do exercise control over animals you need to do so with some level of insight and if you don't have that long-term insight you cause long-term damage to ecosystems and variability to conservation efforts"*

		[trophy hunting] helps stimulate bringing about different genetic pools... and forces you to bring new genes into the system which further down the line enhances the gene pool"
Poaching	18%	*"Guys would lose out on jobs and meat. They would make other options they would poach or hunt meat themselves"; "If you take away legal hunting your illegal hunting will flourish. Without hunting there are no incentives to collect traps and snares"*

Castley, 2014; Powell, Edwards, Powell, & Nieland, 2018), but in our study, financial constraints related to entering and competing in the tourism market were more common. For example, respondents mentioned barriers to entry (more infrastructure and staff may be needed to move from hunting to ecotourism operations, also see Clements et al., 2016), in addition to increased running costs, lower profit margins, and the higher competition in this sector (Table 1). While high-end ecotourism can be highly profitable (Clements et al., 2016) and many landholders seemed willing to shift to ecotourism, in most cases this would require significant investment, possibly from an outside source.

A third of surveyed landholders said they would transition to livestock farming, but many also mentioned both financial and ecological constraints to making this transition (Table 1). This result is perhaps unsurprising: many PLCAs moved away from livestock farming when government subsidies for farming were reduced, and ecotourism and trophy hunting became a more financially viable strategy (Child et al., 2012). Thus, transition options could be biome-dependent: many of our surveyed PLCAs were in areas where rainfall is erratic and farming conditions are difficult.

An interesting result was that one third of participants felt that there was either no other viable land use, or that they would not want to do anything else, as their passion

is for hunting. Constraints to adaptation therefore were not just biophysical and financial, but also related to personal identity, lifestyles and values (Biggs, 2011).

4.2 | Impacts on biodiversity and livelihoods

If two thirds of PLCA owners transitioned away from a wildlife-based land use, there may be important consequences for biodiversity. Many landholders perceived likely impacts on mammals, and certainly transitioning to livestock farms would be incompatible with keeping carnivores and possibly megaherbivores on the land. While two thirds of landholders believed that a change in land use would negatively affect ecological function, actual impacts are uncertain. Livestock farming might not necessarily be bad for biodiversity (Biggs, Reyers, & Scholes, 2006; Broom, Galindo, & Murgueitio, 2013; Duru et al., 2015), and well-managed livestock farms may in fact be better for ecological function that badly-managed game farms (Castley et al., 2001; Cousins et al., 2010; Spear & Chown, 2009).

Impacts on biodiversity, are, however, not the only concern. Our finding that 27% of landholders feel that they could no longer remain financially viable following a trophy hunting ban could have a significant impact on the livelihoods and well-being of landholders, as well as that of their employees. Many landholders mentioned that they would have to retrench staff in the event of a ban (Table 2), which may also lead to displacement of stakeholder (landholders), they nevertheless emphasize that urgent attention is needed from conservation policy makers and international NGOs. If trophy hunting is banned, our work suggests that the identification, development and support of alternative livelihood strategies should be prioritized, and their implications for biodiversity investigated. Such research and discussions could include how to enhance the biodiversity value of alternative land uses (such as sustainable livestock ranches), how to enhance local tourism or hunting markets, and financing to lower barriers of entry into high-end ecotourism (Clements et al., 2016).

The ethical concerns around the livelihood and human well-being impacts resulting from trophy hunting bans also merit attention in policy debates and require further research, including understanding the perceptions of different stakeholders across diverse social-ecological contexts. Since this study only interviewed landholders, we can draw only limited conclusions about the broader impacts of a trophy-hunting ban. Indeed, the impact of PLCAs (informal areas in particular) on livelihoods has been controversial in South Africa. While some researchers argue that PLCAs provide jobs, food, housing and skills (Snyman, 2017; Taylor et al., 2020), others point out that the conversion to game farms from agriculture resulted in many job losses and displacements and criticize the lack of social transformation in PLCA ownership post-Apartheid (Spierenburg & Brooks, 2014). In our study, many landowners suggested that converting back to agrarian land uses or switching to ecotourism

a lion trophy hunting ban across tenure regimes (Lindsey et al., 2012), the limited research on the impacts of a (potential) trophy hunting ban on human livelihoods and well-being has thus far focused almost exclusively on communal conservancies (Angula et al., 2018; Naidoo et al., 2016). PLCAs owned by individual landholders most likely have different implications for livelihoods of both owners and employees to those of a communal conservancy, given the possibly greater financial agency of many private landholders, and the role they play in local socio-economic development in terms of employment creation, skills training and philanthropic development projects (Snyman, 2017). Thus, trophy hunting bans may have significant implications for livelihoods, development and social justice that stretch beyond the implications mentioned by landholders in this study.

4.3 | Implications for policy makers

Although our results were based on a small sample size, and only account for the perceptions of one type of

ing operations would be replaced by new ones in new sectors. However, agrarian conversion might be more plausible in more favorable social-ecological contexts, and there are many potential benefits and costs to other stakeholders that were not considered by landowners in this study.

If trophy hunting is terminated, mechanisms to address the human impacts should adhere to the international mechanisms and procedures established to safeguard human well-being and human rights in conservation (Makagon, Jonas, & Roe, 2014). Safeguarding the rights of indigenous peoples is particularly important, including their rights to participate in decision-making, use and management of their natural resources as indicated in the UN Declaration on the Rights of Indigenous Peoples in 2007, and the Convention on the rights of indigenous and tribal peoples of 1989 (Makagon et al., 2014). For example, an international trophy hunting ban or an import ban on trophies from a country like Namibia (see Naidoo et al., 2016) can have a substantial impact on individual and community livelihoods. In

addition, such bans impact on the rights of communities which have decided to allow managed trophy hunting as a source of revenue in their communal lands.

Ultimately, it is important to consider strategies that recognize that PLCAs (and other areas where trophy hunting is currently practiced) are complex social-ecological systems. PAs are created by people, for people, and are shaped by the social, political, economic and environmental landscape in which they exist (Cumming, 2016; Cumming et al., 2015; Palomo et al., 2014). They are able to respond to, and are affected by, the close interactions between social, economic, political and ecological factors, which occur across multiple scales (Cumming et al., 2015). Our results suggest that a hunting ban will have different consequences for landholders and stakeholders in different social-ecological contexts, and that cross-scale feedbacks from implementing such a policy change is likely to lead to a variety of unintended and potentially undesirable consequences in terms of biodiversity conservation and human livelihoods.

Taking a social-ecological approach to PLCAs, and PAs more generally, is important for exploring the impact of different policies on biodiversity conservation. In this case, it can help transcend the gridlocked debate around whether a ban would be good or bad. Rather, as we have demonstrated in this study, such a ban is likely to have differentiated effects. Given that an international ban is not in the control of the South African government, we suggest that a useful approach to complement this debate may be to pay more attention to building the capacity of

confirm that the authors have no conflict of interest in publishing this manuscript.

AUTHOR CONTRIBUTIONS

All authors contributed to the design and writing of the paper. K. P. and H. S. C. conducted data collection and analyses. A. D. V. and H. S. C. led the writing of the manuscript. A. D. V. was responsible for submitting the manuscript and leading revisions.

DATA AVAILABILITY STATEMENT

Due to interview confidentially, data are not made available online. However, anonymous data can be requested, with motivation, from the authors via email.

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REFERENCES

Angula, H. N., Stuart-Hill, G., Ward, D., Matongo, G., Diggle, R. W., & Naidoo, R. (2018). Local perceptions of trophy hunting on communal lands in Namibia. *Biological Conservation*, *218*, 26–31.

Aronson, J. (1995). A pragmatic view of thematic analysis. *The Qualitative Report*, *2*, 1–3.

Batavia, C., Nelson, M. P., Darimont, C. T., Paquet, P. C., Ripple, W. J., & Wallach, A. D. (2019). The elephant (head) in

for conservation and livelihoods. Such a focus could increase the uptake of scientific evidence in the trophy hunting debate, and could serve to identify nontrophy hunting alternative sources of income in the event of a ban.

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Bauer, N., Vasile, M., & Mondini, M. (2017). Attitudes towards nature, wilderness and protected areas: a way to sustainable stewardship in the South-Western Carpathians. *Journal of Environmental Planning and Management*, *0568*, 1–21.

Biggs, D. (2011). Understanding resilience in a vulnerable industry: The case of reef tourism in Australia. *Ecology and Society*, *61*, 30.

Biggs, R., Reyers, B., & Scholes, R. J. (2006). A biodiversity intactness score for South Africa. *South African Journal of Science*, *102*(7–8), 277–283.

Broom, D. M., Galindo, F. A., & Murgueitio, E. (2013). Sustainable, efficient livestock production with high biodiversity and good welfare for animals. *Proceedings. Biological Sciences*, *280*(1771), 20132025.

Cadman, M. (2010). *Biodiversity for development: South Africa's landscape approach to conserving biodiversity and promoting ecosystem resilience*. Pretoria: South African National Biodiversity Institute.

Castley, J. G., Boshoff, A. F., & Kerley, G. I. H. (2001). Compromising South Africa's natural biodiversity-inappropriate herbivore introductions. *South African Journal of Science*, *97*(9), 344–348.

Chape, S., Harrison, J., Spalding, M., & Lysenko, I. (2005). Measuring the extent and effectiveness of protected areas as an

indicator for meeting global biodiversity targets. *Philosophical Transactions of the Royal Society of London. Series B, Biological Sciences*, *360*, 443–455.

Child, B. A., Musengezi, J., Parent, G. D., & Child, G. F. T. (2012). The economics and institutional economics of wildlife on private land in Africa. *Pastoralism: Research, Policy and Practice*, *2*, 18.

Clements, H. S. (2016). *Multi-scale, social-ecological influences on private land conservation in South Africa*. Retrieved from https://open.uct.ac.za/handle/11427/22718?show=full

Clements, H. S., Baum, J., & Cumming, G. S. (2016). Money and motives: An organizational ecology perspective on private land conservation. *Biological Conservation*, *197*, 108–115.

Clements, H. S., Kerley, G. I. H., Cumming, G. S., De Vos, A., & Cook, C. N. (2019). Privately protected areas provide key opportunities for the regional persistence of large- and medium-sized mammals. *Journal of Applied Ecology*, *56*(3), 537–546.

Cooney, R., Freese, C., Dublin, H., Roe, D., Mallon, D., Knight, M., ... Buyanaa, C. (2017). The baby and the bathwater: Trophy hunting, conservation and rural livelihoods. *Unasylva*, *68*(249), 3–16.

Cousins, J. A., Sadler, J. P., & Evans, J. (2010). The challenge of regulating private wildlife ranches for conservation in South Africa. *Ecology and Society*, *15*, 23.

Cumming, G. S. (2016). The relevance and resilience of protected areas in the Anthropocene. *Anthropocene*, *13*, 46–56.

Cumming, G. S., Allen, C. R., Ban, N. C., Biggs, D., Biggs, H. C., Cumming, D. H., ... Mathevet, R. (2015). Understanding protected area resilience: A multi-scale, social-ecological approach. *Ecological Applications*, *25*(2), 299–319.

De Vos, A., & Cumming, G. S. (2019). Diversity of land tenure contributes to the spatial resilience of protected area networks. *People and Nature*, *1*(3), 331–346.

DEA. (2015). *Biodiversity economy strategy (BES) for the Department* from https://www.washingtonpost.com/news/animalia/wp/2017/12/15/permits-for-elephant-hunting-trophies-from-zimbabwe-are-being-issued-despite-ban/?noredirect=on

Frost, P. G. H., & Bond, I. (2008). The CAMPFIRE programme in Zimbabwe: Payments for wildlife services. *Ecological Economics*, *65*, 776–787.

Gallo, J. A., Pasquini, L., Reyers, B., & Cowling, R. M. (2009). The role of private conservation areas in biodiversity representation and target achievement within the Little Karoo region, South Africa. *Biological Conservation*, *142*, 446–454.

Golden Kroner, R. E., Qin, S., Cook, C. N., Krithivasan, R., Pack, S. M., Bonilla, O. D., ... He, Y. (2019). The uncertain future of protected lands and waters. *Science (New York, NY)*, *364*(6443), 881–886.

Lindsey, P. A., Alexander, R., Mills, M. G. L., Romañach, S., & Woodroffe, R. (2007). Wildlife viewing preferences of visitors to protected areas in South Africa: Implications for the role of ecotourism in conservation. *Journal of Ecotourism*, *6*, 19–33.

Lindsey, P. A., Balme, G. A., Booth, V. R., & Midlane, N. (2012). The significance of African lions for the financial viability of trophy hunting and the maintenance of wild land. *PLoS One*, *7*, e29332.

Lindsey, P. A., Balme, G. A., Funston, P. J., Henschel, P. H., & Hunter, L. T. B. (2016). Life after Cecil: Channelling global outrage into funding for conservation in Africa. *Conservation Letters*, *9*, 296–301.

Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... t'Sas-Rolfes, M. (2014). Underperformance of African protected area networks and the case for new conservation models: Insights from Zambia. *PLoS ONE*, *9*, e94109.

Mabeta, J., Mweemba, B., & Mwitwa, J. (2018). *Biodiversity Finance Initiative (BIOFIN)-Zambia Policy Brief # 3: Key drivers of biodiversity loss in Zambia*. New York, NY: United Nations Development Programme.

Macdonald, D. W., Loveridge, A. J., Dickman, A., Johnson, P. J.,

for South Africa.
Di Minin, E., Leader-Williams, N., & Bradshaw, C. J. A. (2016). Banning trophy hunting will exacerbate biodiversity loss. *Trends in Ecology & Evolution*, *31*, 99–102.
Di Minin, E., & Toivonen, T. (2015). Global protected area expansion: Creating more than paper parks. *BioScience*, *65*, 637–638.
Dickman, A., Packer, C., Johnson, P. J., & Macdonald, D. W. (2018). A sideways look at conservation and consistency in tourism policy. *Conservation Biology*, *32*, 744–746.
Duru, M., Therond, O., Martin, G., Martin-Clouaire, R., Magne, M. A., Justes, E., ... Sarthou, J. P. (2015). How to implement biodiversity-based agriculture to enhance ecosystem services: a review. *Agronomy for sustainable development*, *35*(4), 1259–1281.
Emerton, L., Bishop, J., Thomas, L., Bundesamt für Naturschutz, Germany, IUCN World Commission on Protected Areas, James Cook University, & Cooperative Research Centre for Tropical Rainforest Ecology and Management. (2006). *Sustainable financing of protected areas: A global review of challenges and options*. Gland, Switzerland: IUCN—The World Conservation Union.
Fears, D. (2017). Permits for Elephant Hunting trophies from Zimbabwe are being issued despite ban. *Washington Post*. Retrieved
Review, 47, 247–253.
Maechler, M., Rousseeuw, P., Struyf, A., Hubert, M., Studer, M., & Roudier, P. (2015). cluster: Cluster Analysis Basics and Extensions. R Package Version 2.0.1. Retrieved from https://cran.r-project.org/web/packages/cluster/index.html
Makagon, J. E., Jonas, H., & Roe, D. (2014). *Human Rights Standards for Conservation: Part I. To Which Conservation Actors do International Standards Apply?* Retrieved from www.iied.org@iiedwww.facebook.com/theIIED
Mgonja, J. T., Sirima, A., & Mkumbo, P. J. (2015). A review of ecotourism in Tanzania: Magnitude, challenges, and prospects for sustainability. *Journal of Ecotourism*, *14*, 264–277.
Mitchell, B. A., Stolton, S., Bezaury-Creel, J., Bingham, H. C., Cumming, T. L., Dudley, N., ..., Solano, P. (2018). Guidelines for privately protected areas. Best practice protected area guidelines series No. 29.
Myers, N., Mittermeier, R. A., Mittermeier, C. G., Da Fonseca, G. A., & Kent, J. (2000). Biodiversity hotspots for conservation priorities. *Nature*, *403*, 853–858.
Naidoo, R., Weaver, L. C., Diggle, R. W., Matongo, G., Stuart-Hill, G., & Thouless, C. (2016). Complementary benefits of tourism and hunting to communal conservancies in Namibia. *Conservation Biology*, *30*, 628–638.

Nelson, F., Lindsey, P., & Balme, G. (2013). Trophy hunting and lion conservation: a question of governance?. *Oryx*, *47*(4), 501–509.

Newing, H., Eagle, C. M., Puri, R. K., & Watson, C. W. (2010). *Conducting research in conservation: Social science methods and practice*. Oxfordshire, England: Routledge.

Oksanen, A. J., Blanchet, F. G., Kindt, R., Legendre, P., Minchin, P. R., Hara, R. B. O., ..., Wagner, H.. (2015). Community ecology package: Vegan. Version 2.3-0.

Palomo, I., Montes, C., Martín-López, B., González, J. A., García-Llorente, M., Alcorlo, P., & Mora, M. R. G. (2014). Incorporating the social-ecological approach in protected areas in the Anthropocene. *BioScience*, *64*, 181–191.

Pegas, F. d. V., & Castley, J. G. (2014). Ecotourism as a conservation tool and its adoption by private protected areas in Brazil. *Journal of Sustainable Tourism*, *22*, 604–625.

Powell, L. A., Edwards, R., Powell, K. D. J., & Nieland, K. (2018). Geography of ecotourism potential in the Great Plains: Incentives for conservation. *Great Plains Research*, *28*, 15–24.

R Development Core Team. (2016). *R: A language and environment for statistical computing*. Vienna, Austria: R Foundation for Statistical Computing.

Ripple, W. J., Newsome, T. M., & Kerley, G. I. H. (2016). Does trophy hunting support biodiversity? A response to Di Minin et al. *Trends in Ecology & Evolution*, *31*, 495–496.

Schulze, K., Knights, K., Coad, L., Geldmann, J., Leverington, F., Eassom, A., ... Burgess, N. D. (2018). An assessment of threats to terrestrial protected areas. *Conservation Letters*, *11*, e12435.

Selinske, M. J., Coetzee, J., Purnell, K., & Knight, A. T. (2015). Understanding the motivations, satisfaction, and retention of landowners in private land conservation programs. *Conservation Letters*, *8*, 282–289.

Shumba, T., De Vos, A., Biggs, R., Esler, K. J., Ament, J. M., & Clements, H. S. (2020). Effectiveness of private land conserva-

Snyman, S. (2017). The role of private sector ecotourism in local socio-economic development in Southern Africa. *Journal of Ecotourism*, *16*, 247–268.

Spear, D., & Chown, S. L. (2009). Non-indigenous ungulates as a threat to biodiversity. *Journal of Zoology*, *279*(1), 1–17.

Spierenburg, M., & Brooks, S. (2014). Private game farming and its social consequences in post-apartheid South Africa: Contestations over wildlife, property and agrarian futures. *Journal of Contemporary African Studies*, *32*, 151–172.

Stolton, S., Redford, K. H., Dudley, N., Bill, W., Adams, M., Corcuera, E., & Mitchell, B. A. (2014). *The futures of privately protected areas*. Page IUCN Technical Report.

Taylor, A., Lindsey, P. A., Nicholson, S. K., Relton, C., & Davies-Mostert, H. (2020). Jobs, game meat and profits: The benefits of wildlife ranching on marginal lands in South Africa. *Biological Conservation*, *245*, 108561.

Ward, J. (1963). Hierarchical grouping to optimize an objective function. *Journal of the American Statistical Association*, *58*, 236–244.

Watson, J. E. M., Dudley, N., Segan, D. B., & Hockings, M. (2014). The performance and potential of protected areas. *Nature*, *515*, 67–73.

SUPPORTING INFORMATION

Additional supporting information may be found online in the Supporting Information section at the end of this article.

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2020 FIRST QUARTER NEWSLETTER

Director's Message

Dear friends,

Thank you for your unbelievable support. We are truly humbled. Although conservation areas across the African continent are facing a severe challenge, the hunting community and industry has shown its true colours over the last couple of months, during these times of unprecedented uncertainty for all hunters. In times like these, we must work towards finding solutions. Together

we are important custodians of African wildlife.

As a company, SDM's priority is the protection of our area and the wildlife within it. During this time we have focused our efforts on anti-poaching and essential services in the Panyame Wildlife Conservancy such as our community projects. Further to the responsibility of protecting our wildlife, we also have an obligation to our loyal workforce. Safaris de Moçambique supports an average workforce of 60 individuals from the local community. With an average breadwinner to dependant ratio of 1:8, the company supports almost 500 people.

We are working hard to document all of the work that is being done on the concession and look forward to sharing both our successes and our failures with you!

Best regards,

Simon Rodger
Managing Director

Law Enforcement and Wildlife Protection

There a currently 20 game scouts in the company anti-poaching unit. With so much land to play with, there's no such thing as too many boots on the ground. We have to cover as much ground as possible to be effective. Due to the wet conditions of January, February and March, it has been difficult for the scouts to stay on poachers' spoor. From Jan through April, 21 extended patrols were

completed both on land and water together with officials from the Tchuma Tchato program and local authorities leading to:

- 56 illegal nets confiscated
- 28 wire snares removed
- Active Control of all water points
- Two near arrests with Poachers in the Eastern section of the concession. Unfortunately, they escaped this time! Very difficult to stay on the tracks in the rainy season.

Each snare removed leads to dozens of animals saved because a poacher will keep reusing the same trap.

The Nzou Group after confiscating several illegal nets on a patrol in the Headwaters.

Water patrols

We have allocated 100 litres of petrol per week to two permanent teams tasked with patrolling the fisheries at both the Mbadzi and Main camp area. Comprised of both company members and scouts from the Tchuma Tchato Programme, these teams are in search of illegal, undersized and unlicensed nets in both prohibited and designated fishing zones.

Some of the culprits of illegal fishing are from Zambia or Zimbabwe and are not supposed to be fishing in Mozambique waters. Others are Mozambicans without licenses or who fish with illegally sized nets. The water

patrols have been a massive success as you can see from the sheer number of confiscated nets.

The teams confiscated 56 nets in total during the first quarter of 2020. With an average length of 400m, translating to 22.4 km, each confiscation leads to tens of thousands of fish saved.

Indeed it is our full intention to keep this effort up. The teams are being rotated every 10 to 14 days, with members from the local authorities accompanying each group. As long as we can continue this effort, we can expect to see a dramatic change in the fishery.

This project will bring significant benefits to the local community, ensuring that licensed fisheries remain profitable and sustainable. In the past, we have found that bushmeat poachers use fishing as a scapegoat. Preventing fishing vessels from entering prohibited areas tackles this problem effectively.

Finally, recreational fishing will improve exponentially due to increased law enforcement.

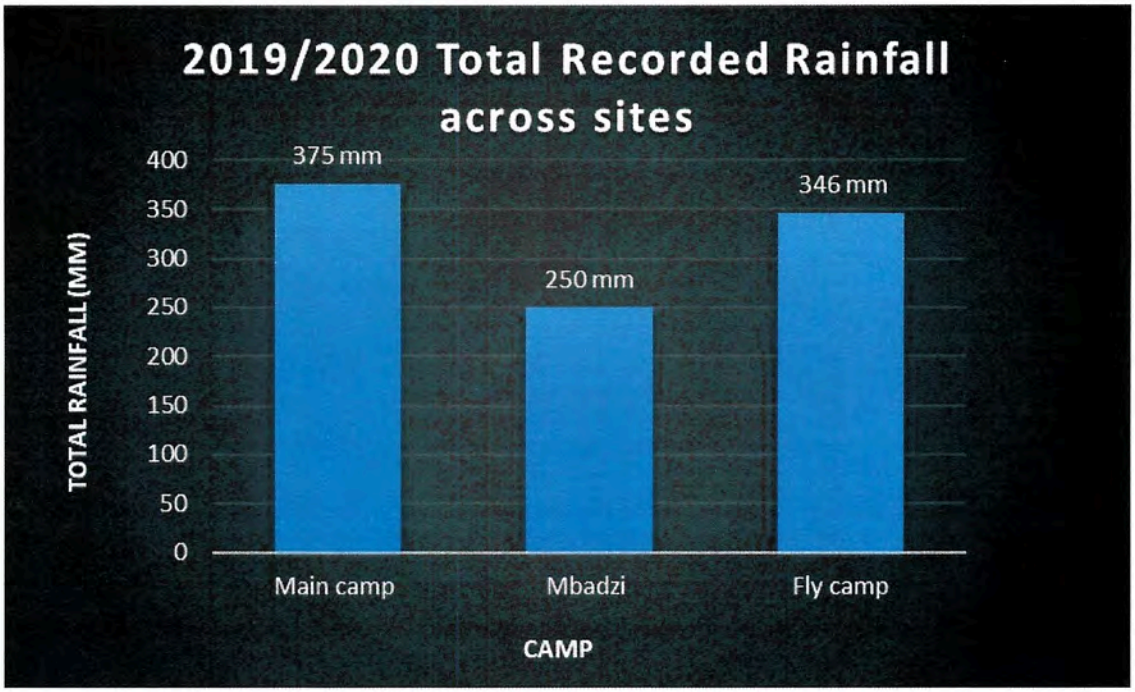
Human-Wildlife Conflict

Human-Wildlife Conflict (HWC) was a severe problem in the area in 2019 with cases of conflict reported almost daily. In 2020 we are committed to developing new ways and means of mitigating this ongoing problem.

The company was recently asked by the local authorities to intervene and destroy an aggressive crop-raiding Hippo near Tsingano village on the Panyame river. The skinners removed an old muzzleloader round from the Hippo carcass, shown in the below image—a reminder of the age-old conflict that occurs between megafauna and people.

This the second incidence of human-wildlife conflict we have dealt with so far this quarter.

A muzzleloader round pulled out of the Hippo.



The first rains were recorded on the 15th of November, and the last on the 17th of March.

A Void to fill: Meat Distribution Program

Annually, Safaris de Moçambique delivers roughly 20 tons of meat to the local community. This programme is an integral part of conservation in the area. The regular distribution of meat to the community removes the need for local people to poach.

The lack of hunts in 2020 will lead to a shortage of protein in the villages, and consequently poaching will increase. We are looking at allocating a portion of the budget for 2020 to buying cattle and goats from the local community, butchering and delivering the meat. Key positive takeaways of this project are the following:

1. Meat derived from the hunting quota will be replaced by livestock animals, thus allowing the company to fulfil its obligations to the local community

and distribute the same amount of protein to the villages.

2. The wildlife population shall rest this year as the company will not fully utilize the quota.
3. Livestock used for this project will be bought from farmers in the surrounding communities and paid for in cash, thus bringing economic benefits for the local community.

Borehole Maintenance

A considerable amount of work goes on behind the scenes in preparation for the end of the rainy season. Simon and Theuns have been getting all the solar pumping systems back up and running.

These water sources are essential for the wildlife and are leading to increased utilisation of grazing in various areas around the concession. We expect to see a dramatic increase in wildlife populations in certain areas because of solar water projects.

See a few pictures below of the pans in all their glory, full of water from the solar systems. We are proud of these systems, and the design is unique. They are theft-proof, waterproof. ...Pretty much bulletproof!

Community Assistance

A community assistance success story during the first quarter of 2020 is that of Chengetai Catapura, a woman from Kabundu village who had severe and life-threatening complications while giving birth to a child. We received a call from Richard Mukende, the chairman at Kabundu village requesting our assistance. We rushed to dispatch a vehicle in time, and she was sent to the clinic across

the river to receive urgent medical care. Without this transport, she would undoubtedly have died.

We continue to help the community with repairs and maintenance on an as and when basis. They have ongoing issues with bicycles, donkey carts etc. One repair that springs to mind so far this year is the maize grinding mill belonging to Coleni Adau, a conservation committee member at Chikodzero village. Without this maize grinding mill, the residents of Chikodzero village are unable to produce mealie meal for food.

The company recorded the following cases of Community assistance during the first quarter:

- Two instances of Emergency medical transport
- Two instances of PAC attended to (Problem Animal Control)
- Several community repairs at the workshop
- Eight footballs distributed to local schools (Pre-COVID-19)

Upcoming Projects

Law Enforcement

- We are currently seeking funding to train and employ an additional 30 game scouts, an increase to 50 in total from the current 20. The reason behind this being the lack of presence throughout the area due to no hunting activity. This presence is a major addition to the anti-poaching

framework through continual traversing of the area. Under normal circumstances, this would occur on a daily basis, throughout the concession from April to November.

- The water patrols have been successful thus far, and we will be continuing this project indefinitely. We have allocated over 100 litres of petrol per week to the patrol teams at Mbadzi and Mizunga base.
- We are currently looking into the use of two conservation tools to assist us in our law enforcement and ecological monitoring efforts. These are SMART Conservation Tool (Spatial Mapping and Reporting Tool) and EARTHRANGER software. A trained technician and mobile devices are needed to implement the project.

SPONSOR A GAME SCOUT

Ecological Monitoring

Simon has installed camera traps at all the waterholes. We are looking forward to seeing some of the videos and pictures and we will be sharing these on our social media channels as well as in our next newsletter!

Community Projects

The following community projects are planned for the next quarter:

- Renovations of the School in Capessa Village
- Renovations of the school in Nhanchenje Village
- Construction of the community centre in the Chintopo area.
- Repairs to the solar pump that we installed at the clinic in Chintopo, which has stopped working due to the theft of components.
- Repair of the solar system at the clinic in Chitete.
- The borehole we drilled for the community at Mamuira has run dry, we are planning on drilling a replacement.
- Launch of the Human-Wildlife Conflict Prevention Unit. We are currently in discussions with the authorities about solutions to these problems, with a specific emphasis on non-lethal solutions.
- Conservation Education courses for kids from the local community will resume as soon as the COVID-19 situation allows for it.

CLICK TO DONATE

Special Thanks

We would like to thank a few special people for their help over the last few months:

- Thank you to John Jackson from Conservation Force, for your contribution setting up channels to fund conservation areas across Africa.
- Thank you to Ivan Carter for supporting our work through his Ivan Carter Conservation Alliance which is a 501c3 in the US.
- A big thank you to the Dallas Safari Club for their anti-poaching initiative to help safari companies during the COVID-19 epidemic. We received a $5,000 USD donation from Dallas Safari Club.
- Last but not least a huge thank you to our clients and friends who have donated funds so generously and without which none of these conservation and community efforts would be possible.

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Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name		1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LONG		DANNY	P	
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address	
(b)(6)				

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 10/16/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo Melanochaita, Lion / Eqqus Quagga, Zebra

   b. Sex (if known). Male / Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:
   Farm Vorstershoop, 8615, Dr RSM, North West, South Africa

   b. Date wildlife was hunted: 08/21/2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Japie Horn
HORNS AFRICA SAFARIS
GG van SchalKwyK

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Solutions Afica
11 Sixth Ave
PoloKwane 0699 SOUTH AFRICA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name: TROPHY SOLUTIONS AFRICA
Address: 11 Sixth Ave
City: PoloKwane 0699
State/Province: SOUTH AFRICA
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
The farm is the only employer for locals in that region.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: (b)(6) _____ Date: ١٥/١٦/٢٠١٧

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 45842

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced: 20 / 08 / 2018 Terminated: 29 / 08 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Host Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: GG VAN SCHALKWYK

Business Address: FARM KORSIEBSHOP

VRYBURG,

NW Code: 8605

ID No: 8309175044 087

PH Permit No: 05/10/2017 NW

Date: 29/8/18 Signature:

CLIENT

Name: DANNY PAUL LONG

Permanent Postal Addr: [redacted] (9)(a)

ROAD 3990 75075

Code:

Country: USA OKLAHOMA

Tel/Fax:

Passport No: [redacted] (9)(a)

Email: [redacted] (9)(a)

Date: 29/08/18 Signature: [redacted] (9)(a)

HUNTING OUTFITTER

Name: GG VAN SCHALKWYK

Business Address: FARM KORSIEBSHOP

CAMP B, VRYBURG 8605

Code:

I.D. No: 8309175044 087

Tel No: 083 2604234 Fax No:

HO Permit No: 024/10/2017 NW

Date: 29/08/18 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
KORSTERSHOP	DR RSM	IVO BOTHA	NW 1081/2014	21/8	LION	1		✓	FULL MOUNT
R180/551231		FARM SMALDEEL		23/8	ZEBRA	1		✓	FLAT SKIN
5089 08L		THEUNISSEN, OFS							
		9410							

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy
Total:

Copies: Client Original White; Hunting Outfitter 1st Copy Pink; Taxidermist 2nd Copy Blue; Professional Hunter 3rd Copy Green; Last Copy Yellow

Forward to Nature Conservation Authority where hunt took place
Retain for a period of three years
Taxidermist
Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more

DRSM 00918/8/2018 NW 5126/08/2018 Application ID 5126

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt, Release .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act, Act No. 3 of 1973; (2) Transvaal Nature Conservation Ordinance No 12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance 19 of 1974

APPROVED SPECIES AND NUMBERS RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details

Surname:	Long
Full Name:	Danny Paul
Id Number:	
Passport:	457173239
Cell Home:	0722087756
Tel Home:	
Tel Work:	
Fax Home:	
Email:	pothachris12@gmail.com

Physical Address

Building	
Street:	18627 County Road 3297
Suburb	Paul's Valley
Town:	Oklahoma
Area Code:	73075
Division Region	Oklahoma
Province/State	USA
Country	USA

Postal Address

Post Office:	
Town	
Postal Code	
District/Region	
Province/State	
Country	

REGION

North West

LOCATION

Facility

Property

Property Name	Farm [illegible] Vorstershoop
Building	
Street:	Farm [illegible] Vorstershoop Vorsterhoop
Suburb	
Town	VORSTERSHOOP
Area Code	8615
Division Region	Ditsong
Province State	North West
Country	South Africa

Stamp if applicable

15 Aug 2018, 09:38 AM

Stamp of Issuing authority

VALIDITY PERIOD

FROM 15/08/2018 TO 14/08/2019

Permit holder / Dealer

Signature of Issuing Authority
(Borho Manganye)

15 Aug 2018, 09:38 AM

Signature of Permit Holder
(Danny Paul Long)

PROPERTIES

Name	Town	Province	Country
Farm Vorstershoop	VORSTERSHOOP	North West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	[illegible]	1	Male	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
Gabriel Gerhardus Van Schalkwyk	065/10/2017NW	0832604234	

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
Gabriel Gerhardus Van Schalkwyk	024/10/2017NW	0832604234	

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
Danny Paul Long	457173239	20/08/2018	31/08/2018	18627N County Road 3290, Pauls Valley, Oklahoma 73075, Oklahoma, USA, USA

ACTIVITIES

Activity Name
Hunt
Release

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Directorate Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, is only valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This permit is valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the specified methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This permit is only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signature of the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permit at any time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt thereto, whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered, lost or destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal, plant or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protected Area, National Park, Provincial Nature Reserve or privately owned land and : - a) the permit holder must beforehand obtain all other relevant written permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this permit, have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized person. 12) An authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this permit, record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register related to the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after performing or completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Issuing Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the permit together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as long as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall apply for the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date thereof. 17) Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback report has been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to: - a) all applicable norms and standards in existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to which this permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or changes thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By signing this permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or failure to render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. b) if the permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fees paid to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is used to

Signature of Issuing Authority
(Bonno Manganye)

15 Aug 2018, 09:38 AM

Signature of Permit Holder
(Danny Paul Long)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

hunt an animal, d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a period of twenty four (24) months prior to the hunting thereof, e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present, f) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or catch any wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use - a) a fire-arm having a barrel of a calibre of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities, b) a fire-arm having a barrel calibre of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhinoceros, hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must - a) obtain the written permission as prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as prescribed in applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt), record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any hunting organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties assisting the permit holder.

Signature of Issuing Authority
(Bortho Manganye)

15 Aug 2018, 09:38 AM

Signature of Permit Holder
(Danny Paul Long)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: NW 5126/08/2018

Details of Hunting area: Name, Size and Ownership
WD Botha, Vorstershoop farm, VORSTERSHOOP ,8615 , District: DR RSM , -Camp B

I hereby acknowledge that I am fully aware of the following:

1. This lion was bred in captivity
2. That this animal will be hunted in a confined area
3. That this lion was released in the hunting area a minimum of 96 hours prior to this hunt
4. That this hunt may not be recorded as a wild or free roaming hunt

(b)(6) [redacted]

Signature of Client (Hunter)

Date

Signature of Professional Hunter No 1

Date

Signature of Professional Hunter no 2

Date

Signature of Hunting Outfitter

Date

Signature of Landowner

Date

The DEDECT
Department:
Economic Development, Environment, Conservation and Tourism
North West Provincial Government
Republic of South Africa

Building
arket Street
O Box 112,
yburg, 8600

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT AND CONSERVATION

Tel: (053) 927 1809
Fax: (053) 927 2904
ehorn@nwpg.gov.za

STATEMENT BY THE HUNTER, PROFESSIONAL HUNTER AND LANDOWNER

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: NW 5126/08/2018

Name of Hunter, Home address, Tel Number and Passport / ID number

Danny Paul LONG : pp(b)(6)

(b)(6) Pauls Valley, Oklahoma, 73075, Oklahoma, USA

Outfitter. Name & North West permit number

GG van Schalkwyk – HO 024/10/2017 NW

Prof Hunters. Name & North West permit number of the two (2) PH's conducting the hunt

GG van Schalkwyk – PH 065/10/2017 NW

Description of animal Sex, Age, Origin (Docs e.g. Transport. Keeping & Import) and exact date and time released

1 x male lion

Vorstershoop farm, Camp B

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD OCT 30 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Infante	Juan	C.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/Initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Medina	Texas	78055		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee– attach documentation of status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby (b)(6) ave read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable par ter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best o e and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Princi permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 10/24/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

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- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
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1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   4610 Modern Ln, Laredo, TX 78041

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   LUIS PEREZ, (830) 7960229, twincityexports@aagarzacantu.com.mx

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO / LION

b. Sex (if known).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

SOUTHAFRICA

b. Date wildlife was hunted:

January, 2012

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

MEXICO, NUEVO LAREDO, TAMAULIPAS

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Juan C. Infante
Address:	Km. 48.5 Carretera Federal, México -Pachuca S/N
City:	Los Reyes Acozac
State/Province:	Tecamac
Country, Postal Code:	Estado de México

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import [redacted] elephant trophies in one calendar year.

Taxidermist/Broker's signature: (b)(6) [redacted] Date: 10/24/2018

11. If you are the hunter applying to import [redacted] please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elep[redacted]n one calendar year.

Applicant's signature: (b)(6) [redacted] Date: 10/24/2018

Be aware that there may be additional p[redacted]pproval requirements by your local or state governments, as well as required by other Federal agenc[redacted]governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS-IA
Falls Church, VA 22041-3803

April 9, 2019

Juan C. Infante
(b)(6)
Medina, TX 78055

Dear Mr. Infante:

We are in receipt of your application requesting a permit under the U.S. Endangered Species Act (Act) to import a sport-hunted lion (*Panthera leo melanochaita*) trophy taken in South Africa, from Nuevo Laredo, Tamaulipas, Mexico. We wish to inform you of the following:

After reviewing your application, we have determined that no permit is required from our office. The lion (*Panthera leo melaochaita*) was listed under the Act as threatened effective January 22, 2016. Since the specimen you wish to import was taken in 2012, prior to the listing of the lion under the Act, the specimen qualifies as pre-Act. As a pre-Act specimen, as long as the trophy animal was not taken contrary to the purposes of the Act and was not held in the course of commercial activity after the listing date, the prohibitions under the Act do not apply to your trophy. Since no permit is required from our office, your application, PRT-13856D, has been administratively closed.

Although you do not require a permit from this office, you will need to establish the pre-Act status of your trophy when entering into the U.S. through a designated wildlife port of entry. You will also need to declare the import of any and all wildlife and wildlife products using Federal Fish and Wildlife Declaration Form 3-177. Please see the attached U.S. regulations regarding pre-Act wildlife for a list of information and documents needed to establish the pre-Act status for your trophy.

If you have questions, contact Biologist Emma Nelson at the Division of Management Authority, Branch of Permits, MS:IA, 5275 Leesburg Pike, Falls Church, Virginia 22041 (1-800-358-2296) FAX: 703-358-2281.

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR data is current as of April 2, 2019

Title 50: Wildlife and Fisheries
PART 17—ENDANGERED AND THREATENED WILDLIFE AND PLANTS
Subpart A—Introduction and General Provisions

§17.4 Pre-Act wildlife.

(a) The prohibitions defined in subparts C and D of this part 17 shall not apply to any activity involving endangered or threatened wildlife which was held in captivity or in a controlled environment on December 28, 1973: *Provided,*

(1) That the purposes of such holding were not contrary to the purposes of the Act; and

(2) That the wildlife was not held in the course of a commercial activity.

Example 1. On January 25, 1974, a tourist buys a stuffed hawksbill turtle (an endangered species listed since June, 1970), in a foreign country. On December 28, 1973, the stuffed turtle had been on display for sale. The tourist imports the stuffed turtle into the United States on January 26, 1974. This is a violation of the Act since the stuffed turtle was held for commercial purposes on December 28, 1973.

Example 2. On December 27, 1973 (or earlier), a tourist buys a leopard skin coat (the leopard has been listed as endangered since March 1972) for his wife in a foreign country. On January 5, he imports it into the United States. He has not committed a violation since on December 28, 1973, he was the owner of the coat, for personal purposes, and the chain of commerce had ended with the sale on the 27th. Even if he did not finish paying for the coat for another year, as long as he had possession of it, and he was not going to resell it, but was using it for personal purposes, the Act does not apply to that coat.

Example 3. On or before December 28, 1973, a hunter kills a leopard legally in Africa. He has the leopard mounted and imports it into the United States in March 1974. The importation is not subject to the Act. The hunter has not engaged in a commercial activity, even though he bought the services of a guide, outfitters, and a taxidermist to help him take, preserve, and import the leopard. This applies even if the trophy was in the possession of the taxidermist on December 28, 1973.

Example 4. On January 15, 1974, a hunter kills a leopard legally in Africa. He has the leopard mounted and imports it into the United States in June 1974. This importation is a violation of the Act since the leopard was not in captivity or a controlled environment on December 28, 1973.

(b) Service officers or Customs officers may refuse to clear endangered or threatened wildlife for importation into or exportation from the United States, pursuant to §14.53 of this subchapter, until the importer or exporter can demonstrate that the exemption referred to in this section applies. Exempt status may be established by any sufficient evidence, including an affidavit containing the following:

(1) The affiant's name and address;

(2) Identification of the affiant;

(3) Identification of the endangered or threatened wildlife which is the subject of the affidavit;

(4) A statement by the affiant that to the best of his knowledge and belief, the endangered or threatened wildlife which is the subject of the affidavit was in captivity or in a controlled environment on December 28, 1973, and was not being held for purposes contrary to the Act or in the course of a commercial activity;

(5) A statement by the affiant in the following language:

The foregoing is principally based on the attached exhibits which, to the best of my knowledge and belief, are complete, true and correct. I understand that this affidavit is being submitted for the purpose of inducing the Federal Government to recognize an exempt status regarding (*insert description of wildlife*), under the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), and regulations promulgated thereunder, and that any false statements may subject me to the criminal penalties of 18 U.S.C. 1001.

(6) As an attachment, records or other available evidence to show:

(i) That the wildlife in question was being held in captivity or in a controlled environment on December 28, 1973;

(ii) The purpose for which the wildlife was being held; and

(iii) The nature of such holding (to establish that no commercial activity was involved).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

R CVD NOV 05 2018

LP

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Behrns	Donald	Eugene	Mr.

(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Bruce	South Dakota	57220	Brookings	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b)(6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Bruce	South Dakota	57220	Brkgs	USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Redaction Code 17 [redacted] 10-24-2018

ntinue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Donald E Behrns
(b)(6)
Bruce, SD 57220

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Donald Behrns (b)(6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

panthera leo

b. Sex (if known). female

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

South Africa Reitzdale Dr RGM MJ Erwee
Farm 239 Lenyesdeel, Tosca
Nora-West

b. Date wildlife was hunted:

23/04/2017 – 27/04/2017

Killed 26/04/2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Reitzdale Farm 239 PH JL Griesel
Leniesdeel, Tosca Outfitter MJ Erwee

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Karoo Taxidermy 15 Vander Biji Street, Industrial Ar
P.O. Box 231
Graaf-Reinet, 6280 South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Karoo Taxidermy
Address: 15 Vander Biji street Industrial area
City: Graaff-Reinet
State/Province: South Africa
Country, Postal Code: 6280

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

NO - See attached pages (1) & (2)

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

$6000 don't know what funds will be used for see pages (1) & (2) attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

I do not - I have no information on th
use of the funds but I can tell you thi
hunt was exceptionally hard and 100%
total fair chase - Tracked for 41 Kilomet
over a 3 day period - If it helps someone el
have an experience like this it is the essenc

RE: Lionesss

From: Carla Vd Vyver (carla@truevb.co.za)

To: debehrns@yahoo.com

Cc: seungriesel20@gmail.com

Date: Tuesday, October 23, 2018, 3:43 AM CDT

Good day Mr Behrns.

Thank you for your patience in this regard.

- The lions that were hunted were not removed from the wild. They were captive bred animals from registered breeding, keeping and hunting facilities. (Copies of relevant government issued permits is available and attached.)

- African lion as a species is currently listed under the Endangered Species Act. The breeding of lions in captive environments in South Africa and the release of these animals for hunting purposes into registered hunting areas are all Government controlled legal activities. Strict legislation and regulations are in place in South Africa in order to monitor that lions bred in captive environments and released for hunting purposes adhere to legal requirements.

  - 9a) The Biodiversity Management plan for African Lion (Panthera leo) in South Africa (Dec,2015) indicates that the population of lions in captive environments in South Africa is about 8000 animals. The population growth of lions in captive environments is actively and adaptively managed.

  - 9b) The hunting of any lions, albeit captive or wild, in South Africa is a restricted activity under various National and Provincial Legislation. License and permit fees are paid to the various government departments - Biodiversity Management sections, for Standing permits, Keeping permits, breeding permits, transport permits, release permits, hunting permits, game farm registration licenses, professional hunter license, hunting outfitters license, Taxidermy permits, Export of Trophy permits and CITES permits. I cannot speculate on how the government appropriates the income they receive from permits and licences

    - § In order for a captive bred lion hunt to be authorized in South Africa, the landowner needs to comply with a list of criteria. One of the criteria is to obtain an Ecological Management plan for the specific area where the animals are to be released

for hunting purposes. Prey base numbers and species variation are part of the aspects that are addressed in these Management Plans. These Management plans are part of the permit conditions for lion release areas and these are monitored by the various Government authorities.

§ In addition, employment is provided to many members of rural communities that would otherwise not have these employment opportunities..

o 9c)The landowner in this specific case conserves, manages and maintains an area of about 3600 hectares (about 8900 acres) of prime lion habitat, as well as prey species. This landowner is a member of the South African Predator Association (SAPA), a member based organisation that represents the captive lion keeping, breeding and hunting industry. A Conservation fund was established by SAPA, with the object of contributing to the conservation of lions in the wild through direct funding of various lion conservation projects. This specific landowner contributes to the SAPA Conservation Fund on a regular basis, both financially and with data pertaining to his lions and lion enterprise.

I trust that this information will be of assistance to you application.

Please feel free to contact me, should you need any information.

Kind Regards / Vriendelike groete

Mrs./Mev. Carla (A.C.) van der Vyver

Director / Direkteur: CVV ENVIRO

Tel: +27(0)83 756 0206

Vryburg,

South Africa.

DISCLAIMER: The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future. The signatory further accepts no liability whatsoever for any loss, whether it be direct, indirect or consequential, arising from this e-mail, nor for any consequence of its use or storage.

(2)

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than

Applicant's signature: (b)(6) Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Permit Number: 10535

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME OF ISSUING AUTHORITY	
NAME	READ
ADDRESS	Nw: Casino Office's
ADDRESS	Lobatse & Koort Rd
PROVINCE	North-West

DETAILS OF PERMIT HOLDER

NAME	Donald Eugene	ID NO.	
SURNAME	Belins	PASSPORT NO.	(b)(6)
POSTAL ADDRESS		RESIDENTIAL ADDRESS	
ADDRESS	(b)(6)		
ADDRESS	Bruce rd	Same	
ADDRESS			
TOWN	Stroud		
POSTAL CODE			
PROVINCE	USA		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	M/S Erwee
NAME AND SURNAME : RESPONSIBLE PERSON	M/S Erwee
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Reitzdale Farm 239
PHYSICAL ADDRESS OF FACILITY	Lenlesdeel, Tosca
DISTRICT	Dr Kgn
PROVINCE	North-West
REGISTERED NAME AND NUMBER (In the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (If applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Female	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 09/04/2017 at 07h00 and hunt from 13/04/2017 at 07h00. Hunt one (1) Captive bred Female lion on the farm Reitzdale and transport the trophy to: Lekgo 19 Kidermy, Graaff Reinet - Eastern Cape

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	D Eugene Belins
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	JL Cuttese
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	M/S Erwee
WEAPON AND METHOD OF HUNTING	375 Sauer, Walk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	N/A
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 09/04/2017	TO:	08/05/2017
RECEIPT NUMBER	R115.00 - EA		
SIGNATURE OF ISSUING OFFICER:		SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	05-04-2017		

blank

ADDRESS	[illegible]
PROVINCE	North West

DETAILS OF PERMIT HOLDER

Donald Eugene Belins	ID NO
[redacted]	PASSPORT NO. (b)(6)
Brule Rd	RESIDENTIAL ADDRESS
5772.0	Same
[illegible]	
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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

,2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Friesen	Kari	M	Ms.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/Initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b)(6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f Country
Detroit Lakes	MN	56501	Becker	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].**

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) [redacted] 11/05/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   (b)(6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Adult Lion

b. Sex (if known). Female

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

South Africa - Latitude -26.129304 Longitude 24.063442 - Reitzdale Concession - Tosco, South Africa (Nearest City)

b. Date wildlife was hunted:

5-20-2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

JP Big Game Safaries Pty Ltd -Juan Pace - Postnetsuite 291, Private bag x 37, Lynwoodridge, 0040

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

FIELD AND STREAM TAXIDERMY PO Box 1256 - 3 Industria Road - Louis Trichardt - 0920
South Africa Tel: +27 15 516 1081 - Fax: +27 15 516 4823 Email: info@fieldandstream.co.az

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Lion not removed from wild. Captive bred from registered breeding,keeping,hunting facility

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Field and Stream
Address:	PO Box 1256 - 3 Industria Road
City:	Louis Trichardt
State/Province:	South Africa 0920
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

See Attached

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

See Attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

See Attached

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: (b)(6) [redacted] Date: 11/05/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

- Question 9 - African lion as a species is currently listed under the Endangered Species Act. The breeding of lions in captive environments in South Africa and the release of these animals for hunting purposes into registered hunting areas are all Government controlled legal activities. Strict legislation and regulations are in place in South Africa in order to monitor that lions bred in captive environments and released for hunting purposes adhere to legal requirements.

- 9a) The Biodiversity Management plan for African Lion (Panthera leo) in South Africa (Dec,2015) indicates that the population of lions in captive environments in South Africa is about 8000 animals. The population growth of lions in captive environments is actively and adaptively managed.

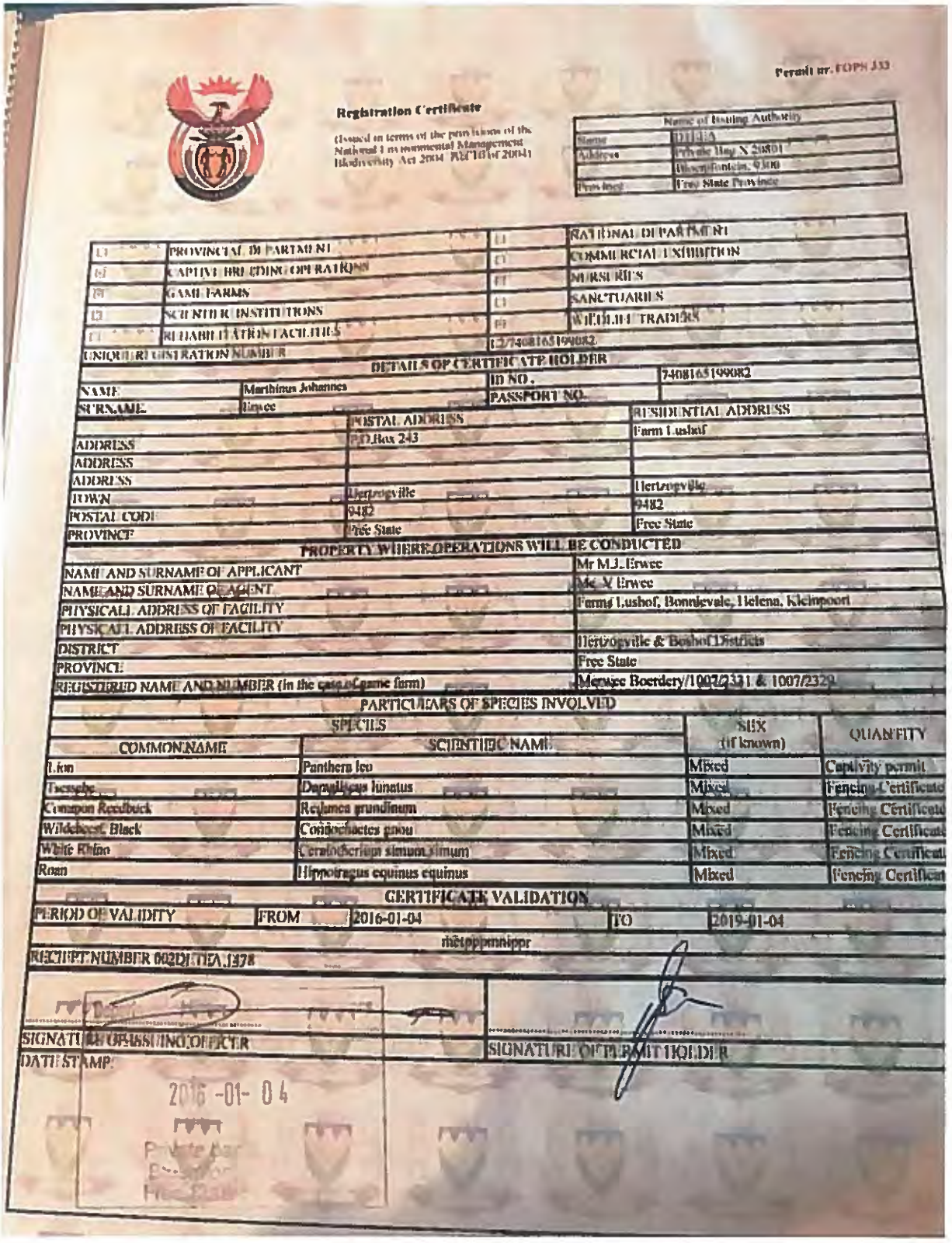
- 9b) The hunting of any lions, albeit captive or wild, in South Africa is a restricted activity under various National and Provincial Legislation. License and permit fees are paid to the various government departments for Standing permits, Keeping permits, breeding permits, transport permits, release permits, hunting permits, game farm registration licenses, professional hunter license, hunting outfitters license, Taxidermy permits, Export of Trophy permits and CITES permits.

- In addition, employment is provided to many members of rural communities that would otherwise not have these employment opportunities. I cannot speculate on how the government appropriates the income they receive from permits and licenses.

- In order for a captive bred lion hunt to be authorized in South Africa, the landowner needs to comply with a list of criteria. One of the criteria is to obtain an Ecological Management plan for the specific area where the animals are to be released for hunting purposes. Prey base numbers and species variation are part of the aspects that are addressed in these Management Plans. These Management plans are part of the permit conditions for lion release areas and these are monitored by the various Government authorities.

- 9c) The landowner in this specific case conserves, manages and maintains an area of about 3600 hectares (about 8900 acres) of prime lion habitat, as well as prey species. This landowner is a member of the South African Predator Association (SAPA), a member based organization that represents the captive lion keeping, breeding and hunting industry. A Conservation fund was established by SAPA, with the object of contributing to the conservation of lions in the wild through direct funding of various lion conservation projects. This specific landowner contributes to the SAPA Conservation Fund on a regular basis, both financially and with data pertaining to his lions and lion enterprise.

FREE STATE REGISTRATION OF FACILITY



Permit nr. FOPN 333

Registration Certificate

(Issued on terms of the provisions of the National Environmental Management Biodiversity Act 2004 (Act 10 of 2004))

Name of Issuing Authority	
Name	[illegible]
Address	Private Bag X20601
	Bloemfontein, 9300
Province	Free State Province

[ ]	PROVINCIAL DEPARTMENT	[ ]	NATIONAL DEPARTMENT
[x]	CAPTIVE BREEDING OPERATIONS	[ ]	COMMERCIAL EXHIBITION
[ ]	GAME FARMS	[ ]	NURSERIES
[ ]	SCIENTIFIC INSTITUTIONS	[ ]	SANCTUARIES
[ ]	REHABILITATION FACILITIES	[ ]	WILDLIFE TRADERS

UNIQUE REGISTRATION NUMBER: [illegible]/7408165199082

DETAILS OF CERTIFICATE HOLDER

NAME	Marthinus Johannes	ID NO.	7408165199082
SURNAME	Erwee	PASSPORT NO.	
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O.Box 243		Farm Lushof
ADDRESS			
ADDRESS			
TOWN	Hertzogville		Hertzogville
POSTAL CODE	9482		9482
PROVINCE	Free State		Free State

PROPERTY WHERE OPERATIONS WILL BE CONDUCTED

NAME AND SURNAME OF APPLICANT	Mr M.J. Erwee
NAME AND SURNAME OF AGENT	Mr M.J. Erwee
PHYSICAL ADDRESS OF FACILITY	Farms Lushof, Bonnievale, Helena, Klempoort
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	Hertzogville & Boshof Districts
PROVINCE	Free State
REGISTERED NAME AND NUMBER (in the case of game farm)	Merwee Boerdery/1007/2321 & 1007/2329

PARTICULARS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Lion	Panthera leo	Mixed	Captivity permit
Tsessebe	Damaliscus lunatus	Mixed	Fencing Certificate
Common Reedbuck	Redunca arundinum	Mixed	Fencing Certificate
Wildebeest, Black	Connochaetes gnou	Mixed	Fencing Certificate
White Rhino	Ceratotherium simum simum	Mixed	Fencing Certificate
Roan	Hippotragus equinus equinus	Mixed	Fencing Certificate

CERTIFICATE VALIDATION

PERIOD OF VALIDITY	FROM	2016-01-04	TO	2019-01-04

RECEIPT NUMBER 602D1TEA1378

SIGNATURE OF ISSUING OFFICER

SIGNATURE OF PERMIT HOLDER

DATE STAMP:

2016 -01- 04

Private Bag
Bloemfontein
Free State

FREE STATE KEEPING FACILITY PERMIT

OFFICIAL PERMIT

98 ZASTRON STREET
AGRICULTURAL BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
FAX: +27 (0) 51 400 9523

destea
department of economic, small business development, tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	7408165199082		
NAME	M.J. Erwee		
PHYSICAL ADDRESS	Lushof Farm Hertzogville	POSTAL ADDRESS	Box 243 Hertzogville 9462
MOBILE NUMBER:	082-337 4996		
FAX NUMBER	N/A		
EMAIL ADDRESS	merweebdy@gmail.com		

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969).
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO;

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species-Scientific Name	Identification	Total
Lions (See attached lists)	Panthera leo	125

The permit holder is authorised to possess the specified animal/s above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE

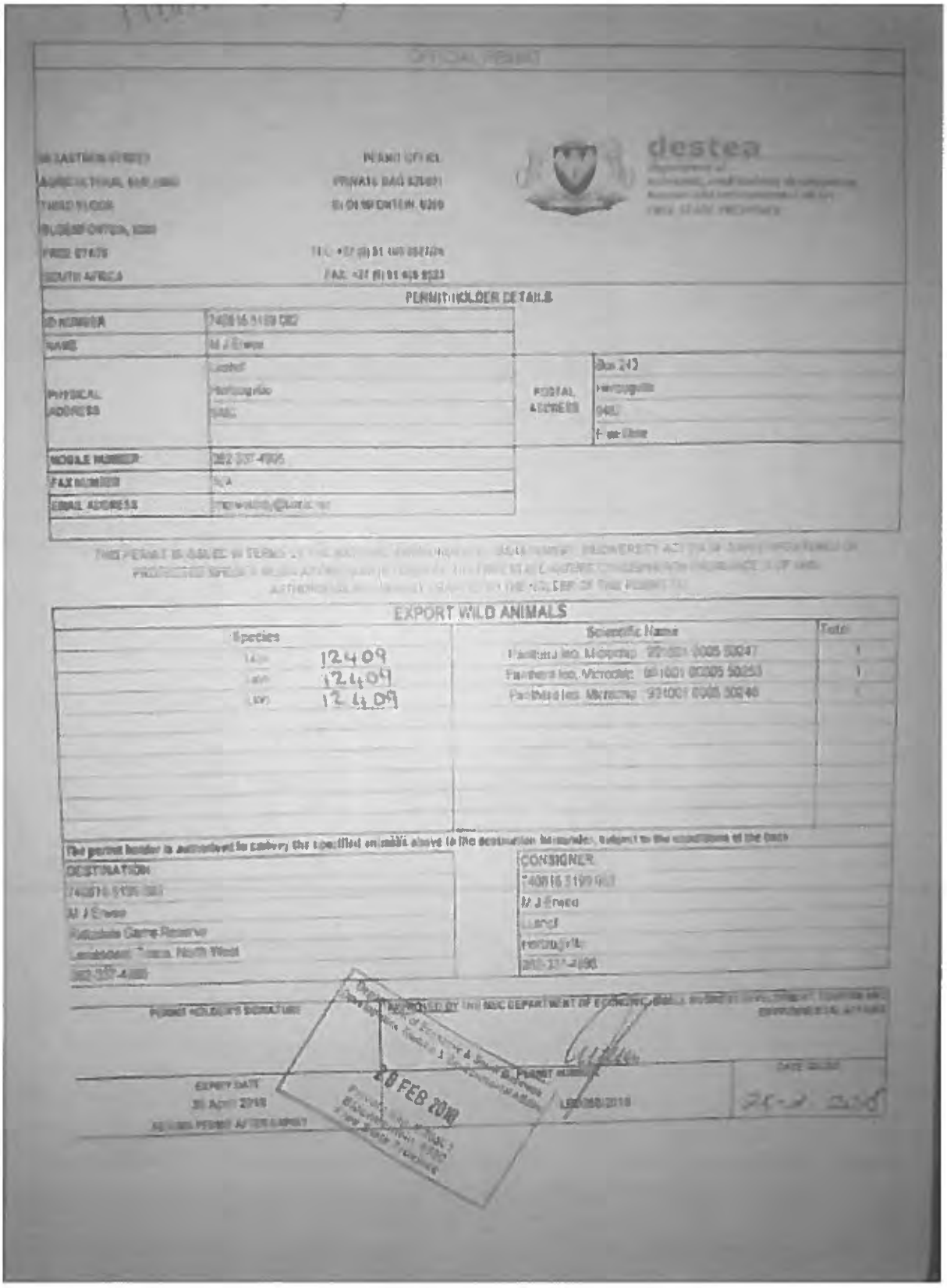
APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AN ENVIRONMENTAL AFFAIR

EXPIRY DATE	PERMIT NUMBER	DATE ISSUED
31 March 2019	NC. 5525/2018	2018 03 11

RETURN PERMIT AFTER EXPIRY

Department of Economic & Small Business Development Tourism & Environmental Affairs
2018 -03- 19
Private bag X 20801
Bloemfontein 9300
Free State Province

FREE STATE TRANSPORT PERMIT 1



OFFICIAL PERMIT

destea

PERMIT HOLDER DETAILS

ID NUMBER	7408165199 082
NAME	M J Erasmus
PHYSICAL ADDRESS	Lastoff Hertzogville 9461
POSTAL ADDRESS	Box 243 Hertzogville 9461 Free State
MOBILE NUMBER	082 337 4995
FAX NUMBER	N/A
EMAIL ADDRESS	[illegible]

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion 12409	Panthera leo Microchip 933001 0005 5004?	1
Lion 12409	Panthera leo Microchip 933001 0005 50053	1
Lion 12409	Panthera leo Microchip 933001 0005 50048	1

The permit holder is authorised to convey the specified animals above to the destination hereunder, subject to the conditions of the back

DESTINATION
7408165199 082
M J Erasmus
Pilanesberg Game Reserve
Landowner Tswana North West
082 337 4995

CONSIGNER
7408165199 082
M J Erasmus
Lastoff
Hertzogville
082 337 4995

PERMIT HOLDER'S SIGNATURE

ISSUED BY THE NSC DEPARTMENT OF ECONOMIC DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS

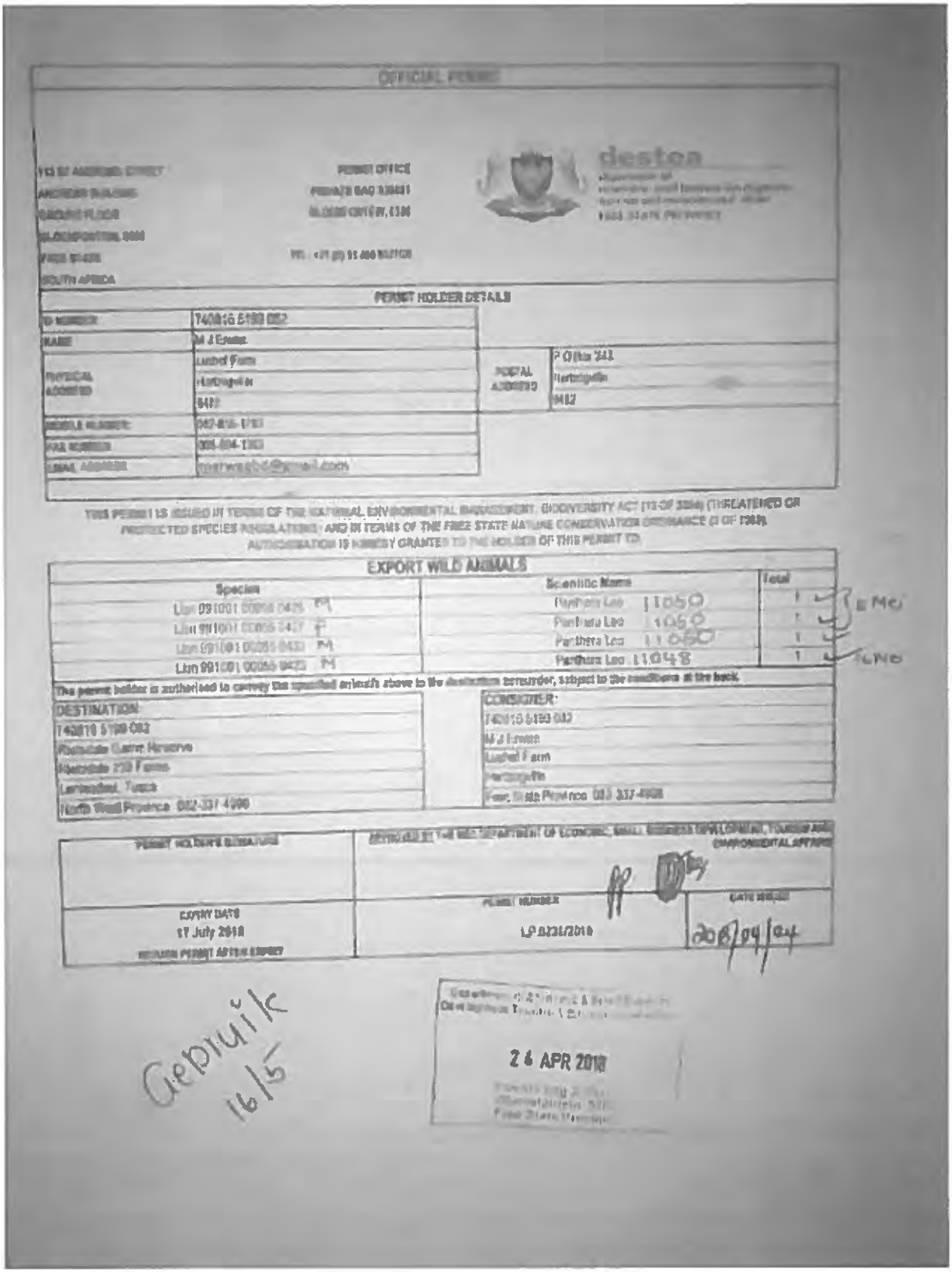
EXPIRY DATE
31 AUG 2018
AS WELL PERMIT AUTHORITY

28 FEB 2018

PERMIT NUMBER
LE/000/2018

DATE ISSUED
24-2-2018

FREE STATE TRANSPORT PERMIT 2



OFFICIAL PERMIT

PERMIT OFFICE

destea

PERMIT HOLDER DETAILS

ID NUMBER	740816 5193 082
NAME	M J Erasmus
PHYSICAL ADDRESS	Lushof Farm Hertzogville 9422
POSTAL ADDRESS	P O Box 243 Hertzogville 9422
MOBILE NUMBER	082-[illegible]
FAX NUMBER	086-[illegible]
EMAIL ADDRESS	[illegible]@gmail.com

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT [10 OF 2004] (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE [8 OF 1969]. AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion 991001 00056 0425 M	Panthera Leo [illegible]1050	1
Lion 991001 00056 0427 F	Panthera Leo [illegible]1050	1
Lion 991001 00056 0433 M	Panthera Leo [illegible]1050	1
Lion 991001 00056 0423 M	Panthera Leo [illegible]1048	1

The permit holder is authorised to convey the specified animals above to the destination hereunder, subject to the conditions at the back.

DESTINATION	CONSIGNER
740816 5193 082 Rietvlei Game Reserve Rietvlei 219 Farms Lanseria, Tuscs North West Province 082-337 4998	740816 5193 082 M J Erasmus Lushof Farm Hertzogville Free State Province 082 337 4998

PERMIT HOLDER'S SIGNATURE	ISSUED BY THE DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS
EXPIRY DATE 17 July 2018 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER LP 0126/2018

DATE ISSUED: 2018/04/24

Deputy
16/5

24 APR 2018

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004 Act 10 of 2004)

PERMIT NUMBER: 0 11950

	NAME OF ISSUING AUTHORITY
NAME	MOLOPO L C [illegible]
ADDRESS	[illegible]
ADDRESS	[illegible]
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	MJ Ewee	ID NO.	(b)(6)
SURNAME	Ewee	PASSP	
		RESIDENTIAL ADDRESS	
ADDRESS	(b)(6)	Lusthof farm	
ADDRESS			
ADDRESS			
TOWN	Hertzogville	Hertzogville	
POSTAL CODE	9482	9482	
PROVINCE	Free State	Free State	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MJ Ewee
NAME AND SURNAME : RESPONSIBLE PERSON	MJ Ewee
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Lusthof farm
PHYSICAL ADDRESS OF FACILITY	Hertzogville
DISTRICT	
PROVINCE	Free State
REGISTERED NAME AND NUMBER (In the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	✓ 0235 2018
Lion	Panthera leo	Female	01	✓ 0246 2018

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Transport of two (02) captive bred male lion and two (02) female captive bred lion from MJ Ewee Lusthof farm, Hertzogville to MJ Ewee, Farm Rietfontein, Ladismith, Cape.

NAME AND SURNAME OF PURCHASER / SELLER	MJ Ewee
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	Rietfontein Farm 239, Tenaatstad, Cape

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	N/A
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

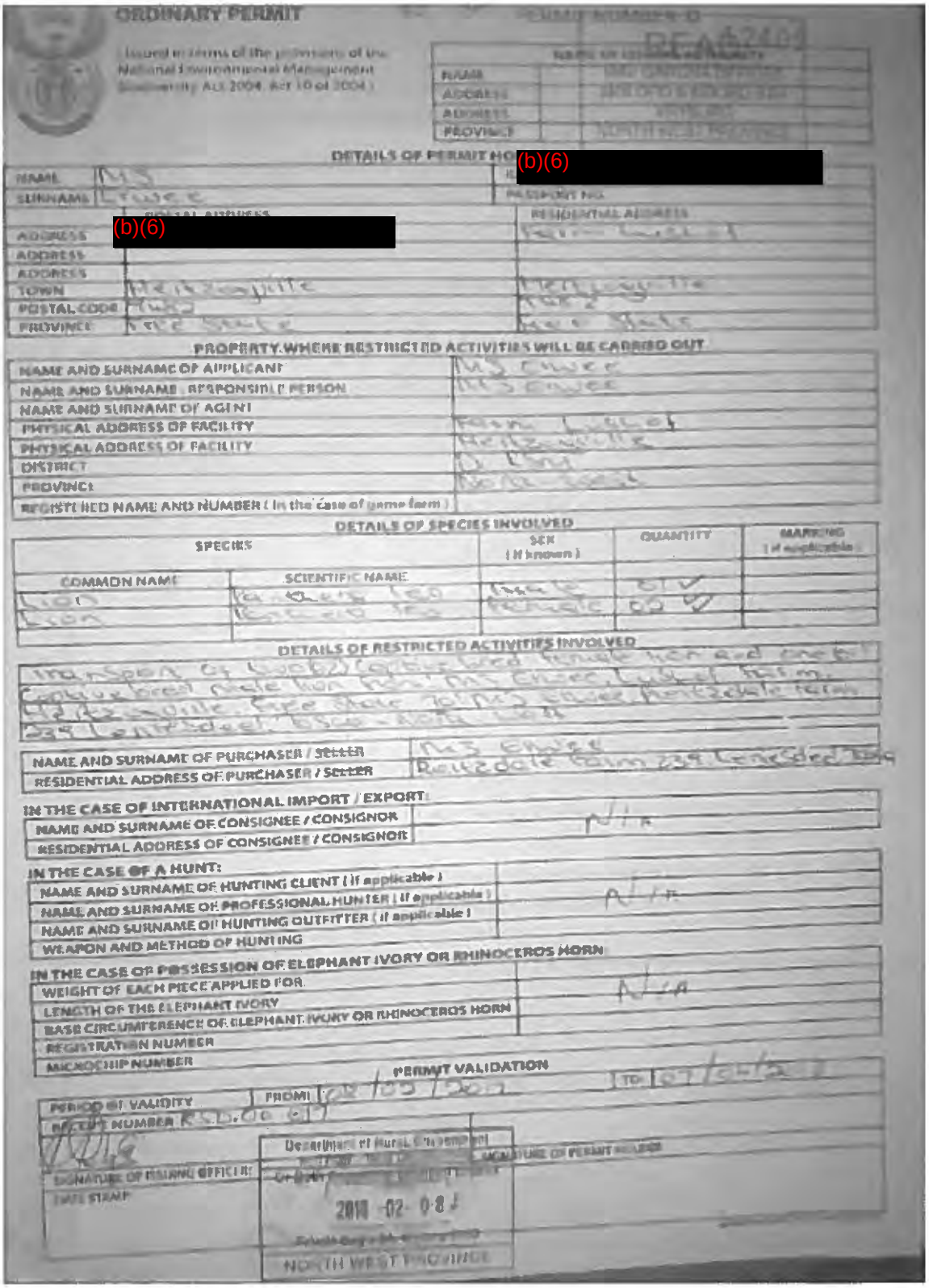
IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	N/A
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 18 Jan 2018	TO: 17 Oct 2018	
RECEIPT NUMBER	RSD-00-[illegible]		
SIGNATURE OF ISSUING OFFICER:	Dr Rath Sustainable Development	SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	2018 -04- 1[illegible]		

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT



ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act, 2004, Act 10 of 2004)

DETAILS OF PERMIT HOLDER

NAME	M S
SURNAME	Ewer
ADDRESS	(b)(6)
ADDRESS	
ADDRESS	
TOWN	Potchefstroom
POSTAL CODE	2531
PROVINCE	North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MS Ewer
NAME AND SURNAME / RESPONSIBLE PERSON	MS Ewer
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Lot 69
PHYSICAL ADDRESS OF FACILITY	Potchefstroom
DISTRICT	Dr Kenneth Kaunda
PROVINCE	North West
REGISTERED NAME AND NUMBER (In the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (If applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Transport of Lion (1) Lioness (2) female per and one (1) Cub between Potchefstroom Farm MS Ewer, Lot 69 Farm Potchefstroom to Farm 239 Leeuwdale Farm 239 Leeuwdale Farm

NAME AND SURNAME OF PURCHASER / SELLER	MS Ewer
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	Leeuwdale Farm 239 Leeuwdale Farm

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	N/A
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	
WEAPON AND METHOD OF HUNTING	

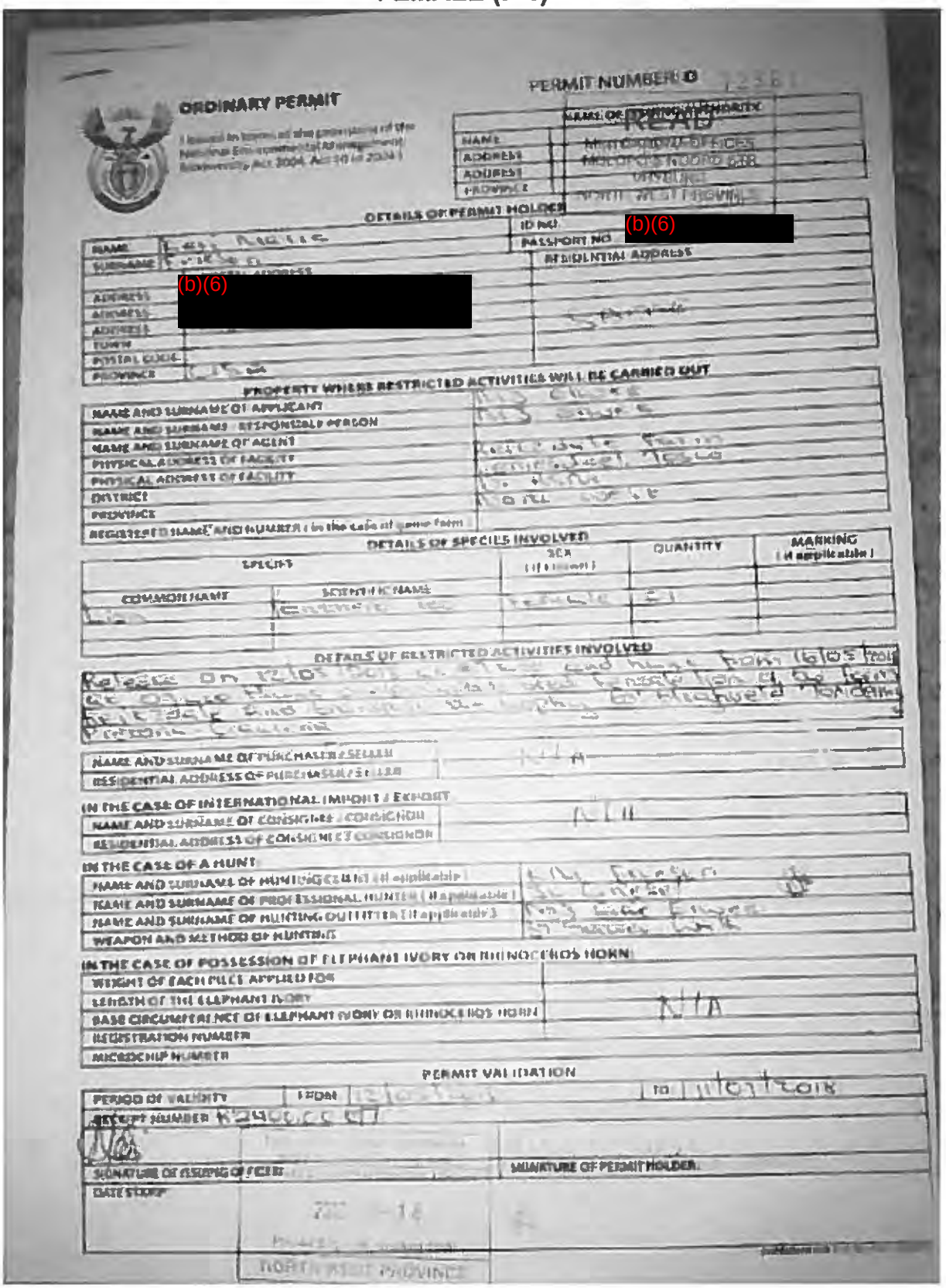
IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN

WEIGHT OF EACH PIECE APPLIED FOR	N/A
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 08/02/2018 TO: 07/04/2018
RECEIPT NUMBER	R 340.00
SIGNATURE OF ISSUING OFFICIAL	
DATE STAMP	Department of Rural Development and Land Reform 2018 -02- 08 NORTH WEST PROVINCE
SIGNATURE OF PERMIT HOLDER	

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - FEMALE (P 1)



ORDINARY PERMIT

PERMIT NUMBER

DETAILS OF PERMIT HOLDER

(b)(6)

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

DETAILS OF SPECIES INVOLVED

SPECIES | SEX | QUANTITY | MARKING

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT

IN THE CASE OF A HUNT

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN

N/A

PERMIT VALIDATION

NORTH WEST PROVINCE

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - FEMALE (P 2)

Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted: - - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity. Tell: 053 928 0656 or \071 889 7867\082 446 1816
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.
This permit is subjected to the approved Management plan of the facility. **The permit holder of this permit is binded by the contents of the approved Management Plan of this facility.** **Any contravention to the contents of the approved Management Plan of this facility will be an offence.** **The permit holders and the owner of this facility must report the escape, injury or death (to animals and to any human being) to the Vryburg Conservation office, as well as the local SAPS office within 24 hours of the incident**

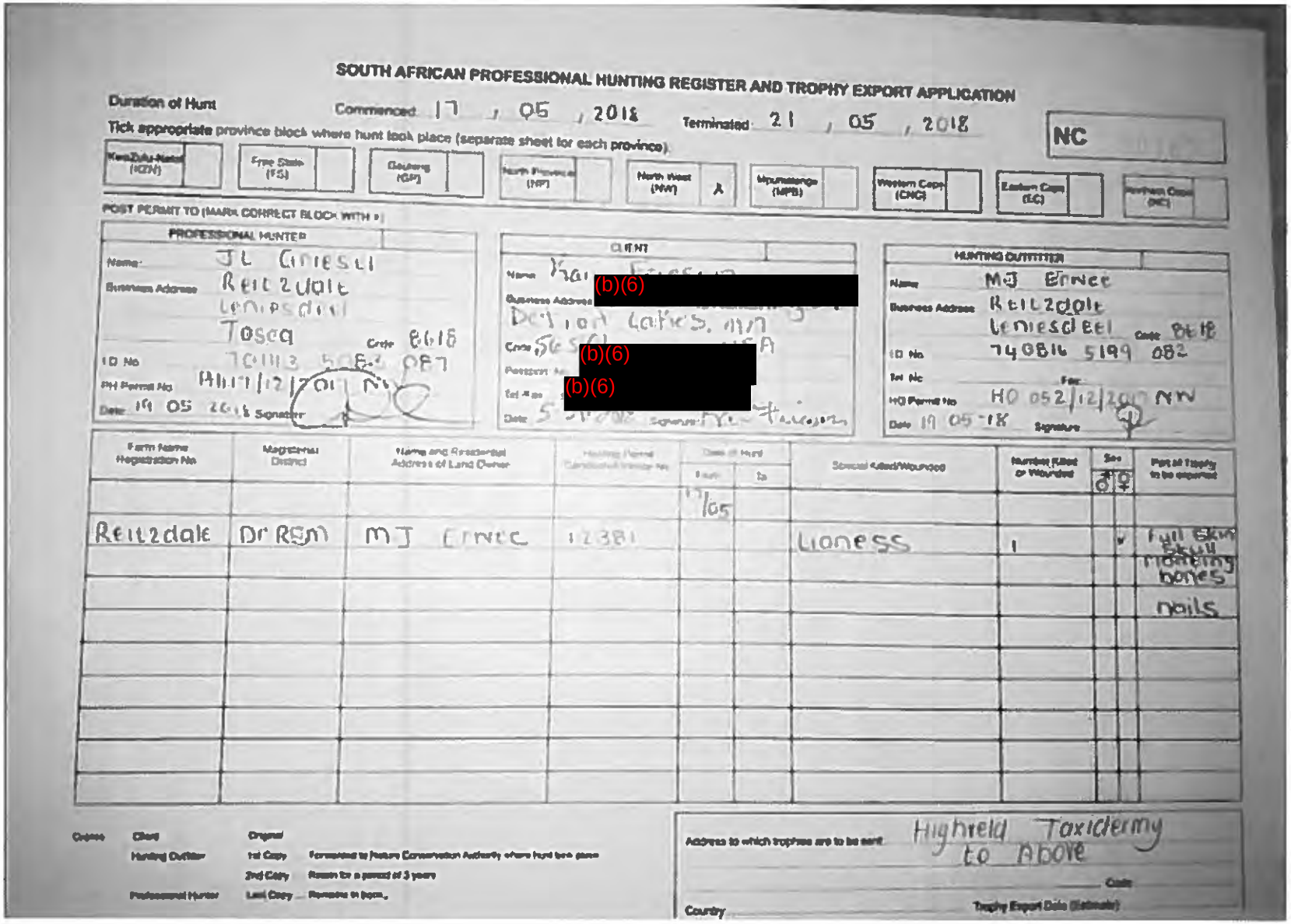
Signature of Issuing Officer: _____ Date: 8/04/2018

Signature of hunter: _____ Date: 17/05/18

Signature of land owner: _____ Date: 17/05/18

Signature of PH: _____ Date: 17/05/18

2018 -04- 18



SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt Commenced 17 , 05 , 2018 Terminated 21 , 05 , 2018

Tick appropriate province block where hunt took place (separate sheet for each province)

NC

POST PERMIT TO (MARK CORRECT BLOCK WITH X)

PROFESSIONAL HUNTER

Name: JL Ciniesi

Business Address: Reitzdale Leniesdal Tosca Code 8618

ID No 7011[illegible]

PH Permit No NW 17/12/201[illegible]

Date 19 05 2018 Signature

CLIENT

Name [illegible]

Business Address [redacted] Code [illegible]

ID No [redacted]

Tel No [redacted]

Date [illegible] Signature [illegible]

HUNTING OUTFITTER

Name MJ Ernee

Business Address Reitzdale Leniesdleel Code 8618

ID No 740816 5199 082

Tel No Fax

HO Permit No HO 052/12/201[illegible] NW

Date 19 05 18 Signature

Farm Name Registration No	Magisterial District	Name and Residential Address of Land Owner	Hunting Permit Concession Number No	Date of Hunt From	Date of Hunt To	Species Killed/Wounded	Number Killed or Wounded	Sex ♂	Sex ♀	Part of Trophy to be exported
				17/05						
Reitzdale	Dr RSM	MJ Ernee	12381			Lioness	1		✓	Full skin Skull Hunting bones
										nails

Colour Client Original

Hunting Outfitter 1st Copy Forwarded to Nature Conservation Authority where hunt took place

2nd Copy Retain for a period of 3 years

Professional Hunter Last Copy Remains in book

Address to which trophies are to be sent Highveld Taxidermy to Above

Code

Country Trophy Export Date (Estimate)

SA HUNTING REGISTER - FEMALE
K FRIESEN

Form 3-200-20

OMB Control No: 1018-0093
Expires 05/31/2020

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Friesen	Brett	A.	Mr.

(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)		
2. Principal Officer/Owner	3. Principal Officer/Owner's Title		
4. Business Mailing Address	5. Business Phone Number	6. Business Fax Number	7. Business E-mail Address

Section C: All applicants complete address information

(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Detroit Lakes	MN	56501	Becker	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in *Title 50 Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Brett Friesen

Digitally signed by Brett Friesen
DN: cn=Brett Friesen, o=, email=[redacted]@fwsmail.gov, c=US
Date: 2019.[redacted]

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting, please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

(b)(6) [redacted]

5. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name:

Adult Lion

b. Sex (if known): Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

South Africa - Latitude -26.149147 Longitude 24.081302 - Reitzdale Concession – Tosca, South Africa (Nearest City)

b. Date wildlife was hunted:

05/19/2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

JP Big Game Safaries Pty Ltd - Juan Pace - Postnetsuite 291, Private bag x 37, Lynwoodridge, 0040

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

FIELD AND STREAM TAXIDERMY P.O Box 1256 - 3 Industria Road - Louis Trichardt - 0920 South Africa Tel: +27 15 516 1081 - Fax: +27 15 516 4823 Email: info@fieldandstream.co.za

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Lion not removed from wild. Captive bred from registered breeding,keeping,hunting facility.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Field and Stream
Address:	PO Box 1256 - 3 Industria Road
City:	Louis Trichardt
State/Province:	South Africa 0920
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

See Attached

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

See Attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

See Attached

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: Brett Friesen Digitally signed by Brett Friesen DN: cn=Brett Friesen, o=US email=bfriesen@fwsvisors.com, c=US Date: 2018.11.05 15:54:54 -05'00' Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

- Question 9 - African lion as a species is currently listed under the Endangered Species Act. The breeding of lions in captive environments in South Africa and the release of these animals for hunting purposes into registered hunting areas are all Government controlled legal activities. Strict legislation and regulations are in place in South Africa in order to monitor that lions bred in captive environments and released for hunting purposes adhere to legal requirements.

- 9a) The Biodiversity Management plan for African Lion (Panthera leo) in South Africa (Dec,2015) indicates that the population of lions in captive environments in South Africa is about 8000 animals. The population growth of lions in captive environments is actively and adaptively managed.

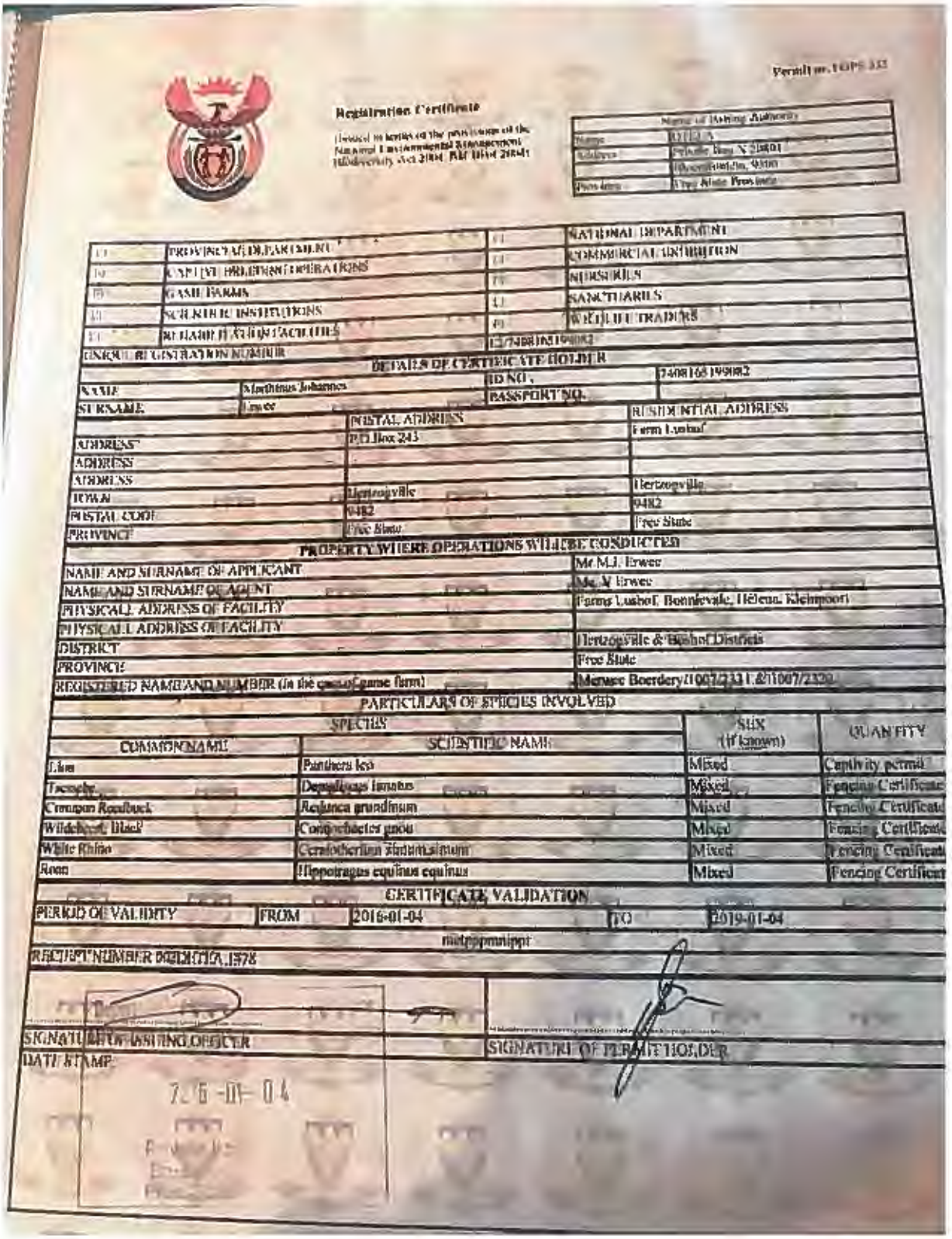
- 9b) The hunting of any lions, albeit captive or wild, in South Africa is a restricted activity under various National and Provincial Legislation. License and permit fees are paid to the various government departments for Standing permits, Keeping permits, breeding permits, transport permits, release permits, hunting permits, game farm registration licenses, professional hunter license, hunting outfitters license, Taxidermy permits, Export of Trophy permits and CITES permits.

- In addition, employment is provided to many members of rural communities that would otherwise not have these employment opportunities. I cannot speculate on how the government appropriates the income they receive from permits and licenses.

- In order for a captive bred lion hunt to be authorized in South Africa, the landowner needs to comply with a list of criteria. One of the criteria is to obtain an Ecological Management plan for the specific area where the animals are to be released for hunting purposes. Prey base numbers and species variation are part of the aspects that are addressed in these Management Plans. These Management plans are part of the permit conditions for lion release areas and these are monitored by the various Government authorities.

- 9c) The landowner in this specific case conserves, manages and maintains an area of about 3600 hectares (about 8900 acres) of prime lion habitat, as well as prey species. This landowner is a member of the South African Predator Association (SAPA), a member based organization that represents the captive lion keeping, breeding and hunting industry. A Conservation fund was established by SAPA, with the object of contributing to the conservation of lions in the wild through direct funding of various lion conservation projects. This specific landowner contributes to the SAPA Conservation Fund on a regular basis, both financially and with data pertaining to his lions and lion enterprise.

FREE STATE REGISTRATION OF FACILITY



Permit no. [illegible]

Registration Certificate

Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004 (Act 10 of 2004)

Name of Issuing Authority	
Name	[illegible]
Address	[illegible]
	[illegible]
Province	Free State Province

[illegible]	PROVINCIAL/PARASTATAL	[illegible]	NATIONAL DEPARTMENT
[illegible]	CAPTIVE BREEDING OPERATIONS	[illegible]	COMMERCIAL DISTRIBUTION
[illegible]	GAME FARMS	[illegible]	NURSERIES
[illegible]	SCIENTIFIC INSTITUTIONS	[illegible]	SANCTUARIES
[illegible]	RETAIL TRADING FACILITIES	[illegible]	WHOLESALE TRADERS

UNIQUE REGISTRATION NUMBER: [illegible]7408166199082

DETAILS OF CERTIFICATE HOLDER

NAME	Matthinus Johannes	ID NO.	7408166199082
SURNAME	Erwee	PASSPORT NO.	

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS	P.O Box 243	Farm Lushof
ADDRESS		
ADDRESS		
TOWN	Hertzogville	Hertzogville
POSTAL CODE	9482	9482
PROVINCE	Free State	Free State

PROPERTY WHERE OPERATIONS WILL BE CONDUCTED

NAME AND SURNAME OF APPLICANT	Mr M.J. Erwee
NAME AND SURNAME OF AGENT	Mr. M Erwee
PHYSICAL ADDRESS OF FACILITY	Farms Lushof, Bonnievale, Helena, Welmoori
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	Hertzogville & Bothaville Districts
PROVINCE	Free State
REGISTERED NAME AND NUMBER (in the case of game farms)	Merusa Boerdery/[illegible]1007/2331 &[illegible]1007/2329

PARTICULARS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Lion	Panthera leo	Mixed	Captivity permit
Tsessebe	Damaliscus lunatus	Mixed	Fencing Certificate
Common Reedbuck	Redunca arundinum	Mixed	Fencing Certificate
Wildebeest, Black	Connochaetes gnou	Mixed	Fencing Certificate
White Rhino	Ceratotherium simum simum	Mixed	Fencing Certificate
Roan	Hippotragus equinus equinus	Mixed	Fencing Certificate

CERTIFICATE VALIDATION

PERIOD OF VALIDITY	FROM	2016-01-04	TO	2019-01-04

[illegible]

RECEIPT NUMBER [illegible]1378

SIGNATURE OF ISSUING OFFICER

SIGNATURE OF PERMIT HOLDER

DATE STAMP

16-01-04

FREE STATE KEEPING FACILITY PERMIT

OFFICIAL PERMIT

98 ZASTRON STREET
AGRICULTURAL BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20601
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9537/28
FAX: +27 (0) 51 400 9523

destea
department of economic, small business development, tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	7408165199002
NAME	M.J. Erwee
PHYSICAL ADDRESS	Liefhof Farm Hertzogville
POSTAL ADDRESS	Box 243 Hertzogville 9462
MOBILE NUMBER	082-337 4808
FAX NUMBER	N/A
EMAIL ADDRESS	merweeivdr@gmail.com

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969).
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species-Scientific Name	Identification	Total
Lions (See attached lists)	Panthera leo	125

The permit holder is authorised to possess the specified animals above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE

APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AN ENVIRONMENTAL AFFAIR

EXPIRY DATE
31 March 2018

PERMIT NUMBER
NC. 5525/2018

DATE ISSUED
2017 02 11

RETURN PERMIT AFTER EXPIRY

Department of Economic & Small Business Development Tourism & Environmental Affairs
2018 -03- 19
Private bag X 20801
Bloemfontein 9300
Free State Province

FREE STATE TRANSPORT PERMIT 1

PERMIT HOLDER DETAILS

ID NUMBER	[redacted]
NAME	M J Erwee
PHYSICAL ADDRESS	[redacted]
POSTAL ADDRESS	[redacted]
MOBILE NUMBER	082 337 4995
FAX NUMBER	N/A
EMAIL ADDRESS	[redacted]

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion	Panthera leo Melanochaita	1
Lion	Panthera leo Melanochaita	1
Lion	Panthera leo Melanochaita	1

DESTINATION

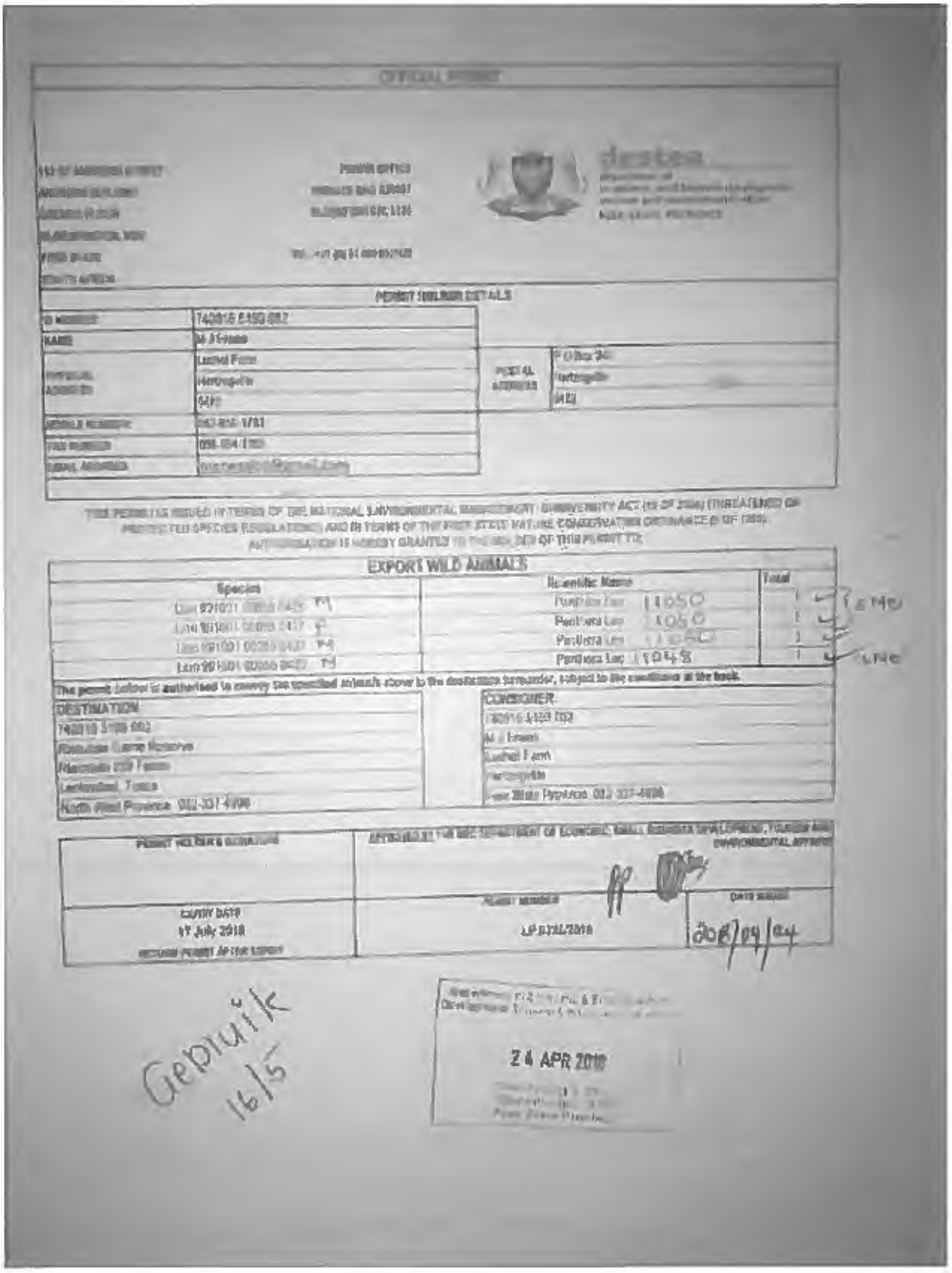
[redacted]
M J Erwee
[redacted]

CONSIGNEE

[redacted]
M J Erwee
[redacted]

28 FEB 2018

FREE STATE TRANSPORT PERMIT 2



OFFICIAL PERMIT

PERMIT HOLDER DETAILS

EXPORT WILD ANIMALS

Species	Scientific Name	Total
[illegible]	Panthera Leo 11650	1
[illegible]	Panthera Leo 11650	1
[illegible]	Panthera Leo 11650	1
[illegible]	Panthera Leo 11645	1

The permit below is authorised to convey the specified animals under to the destinations surrender, subject to the conditions at the back.

DESTINATION

CONSIGNEE

PERMIT HOLDER'S SIGNATURE

APPROVED BY THE DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS

EXPIRY DATE
17 July 2018

PERMIT NUMBER
LP 0125/2018

DATE ISSUED
20/04/24

Geburik
16/5

24 APR 2018

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT

ORDINARY PERMIT

Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004 (Act 10 of 2004)

NAME	
ADDRESS	
ADDRESS	
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME		ID NO.	
SURNAME		PASSPORT NO.	
		RESIDENTIAL ADDRESS	
ADDRESS	(b)(6)		
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	
NAME AND SURNAME : RESPONSIBLE PERSON	
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	
PROVINCE	
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			

DETAILS OF [illegible] ACTIVITIES INVOLVED

NAME AND SURNAME OF PURCHASER / SELLER	
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

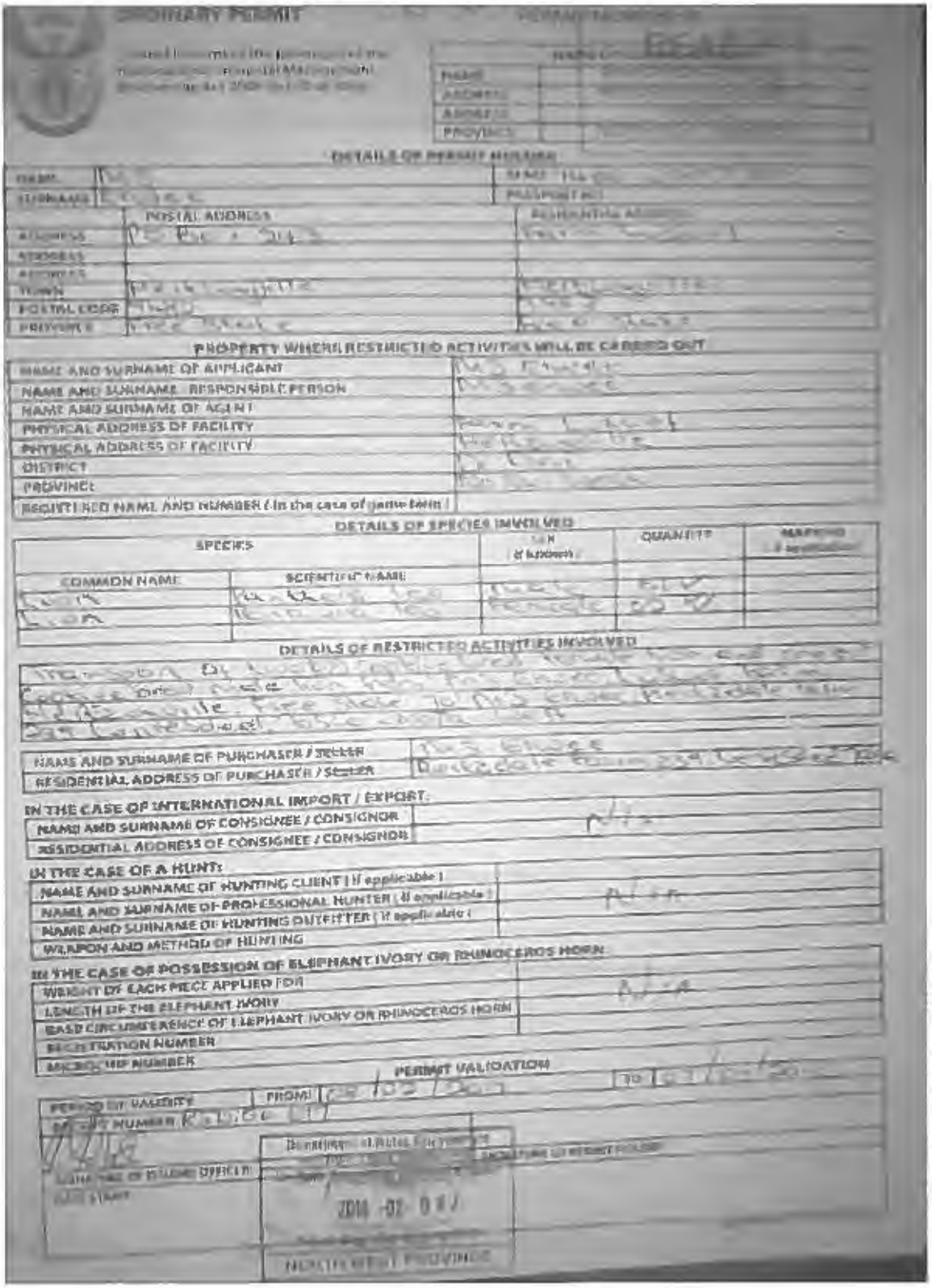
IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM:	TO:	
PERMIT NUMBER			
SIGNATURE OF ISSUING OFFICIAL: Dr [illegible]		SIGNATURE OF PERMIT HOLDER	
DATE ISSUED:	2018-04-1		

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT



PROVINCIAL PERMIT

DETAILS OF PERMIT HOLDER

NAME	
SURNAME	
	POSTAL ADDRESS
ADDRESS	
ADDRESS	
ADDRESS	
TOWN	
POSTAL CODE	
PROVINCE	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	
NAME AND SURNAME - RESPONSIBLE PERSON	
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	
PROVINCE	
REGISTERED NAME AND NUMBER (In the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

NAME AND SURNAME OF PURCHASER / SELLER	
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: TO:
PERMIT NUMBER	
NAME AND TITLE OF ISSUING OFFICIAL	
SIGNATURE	

2014 -07- 04

NORTH WEST PROVINCE

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - MALE (P 1)

ORDINARY PERMIT

Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004 (Act 10 of 2004)

PERMIT NUMBER: 0 1238

	NAME OF ISSUING AUTHORITY
NAME	
ADDRESS	
ADDRESS	
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME		ID NO	
SURNAME		PASSPORT NO	
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS			
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	
NAME AND SURNAME: RESPONSIBLE PERSON	
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	
PROVINCE	
REGISTERED NAME AND NUMBER (if the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (Male / Female)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

NAME AND SURNAME OF PURCHASER / SELLER	
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	N/A
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM:	TO:	
PERMIT NUMBER:			
SIGNATURE OF ISSUING OFFICIAL:		SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:			

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - MALE (P 2)

Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters).
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing, release and/ or transport, the following must be noted: - Darting / immobilisation may only be done by a registered Veterinarian. The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities, i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. Please notify the [illegible] activity of the [illegible] **Tell: 053 928 0056 or \071 869 7867\082 446 1616**
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINANCE 19/74, BOPHUTHATSWANA NATURE CONSERVATION Act 3 1973 AND 50(1)(a)(i)(ii)(iii)(c) of the Biodiversity Act, Act 10 of 2004 and Reg. 31 to 33 and 40 of the TOPS regulations.
This permit is subjected to the approved Management plan of the facility. **The permit holder of this permit is binded by the contents of the approved Management Plan of this facility.** **Any contravention to the contents of the approved Management Plan of this facility will be an offence.** **The permit holders and the owner of this facility must report the escape, injury or death (to animals and to any human being) to the Vryburg Conservation office, as well as the local SAPS office within 24 hours of the incident**

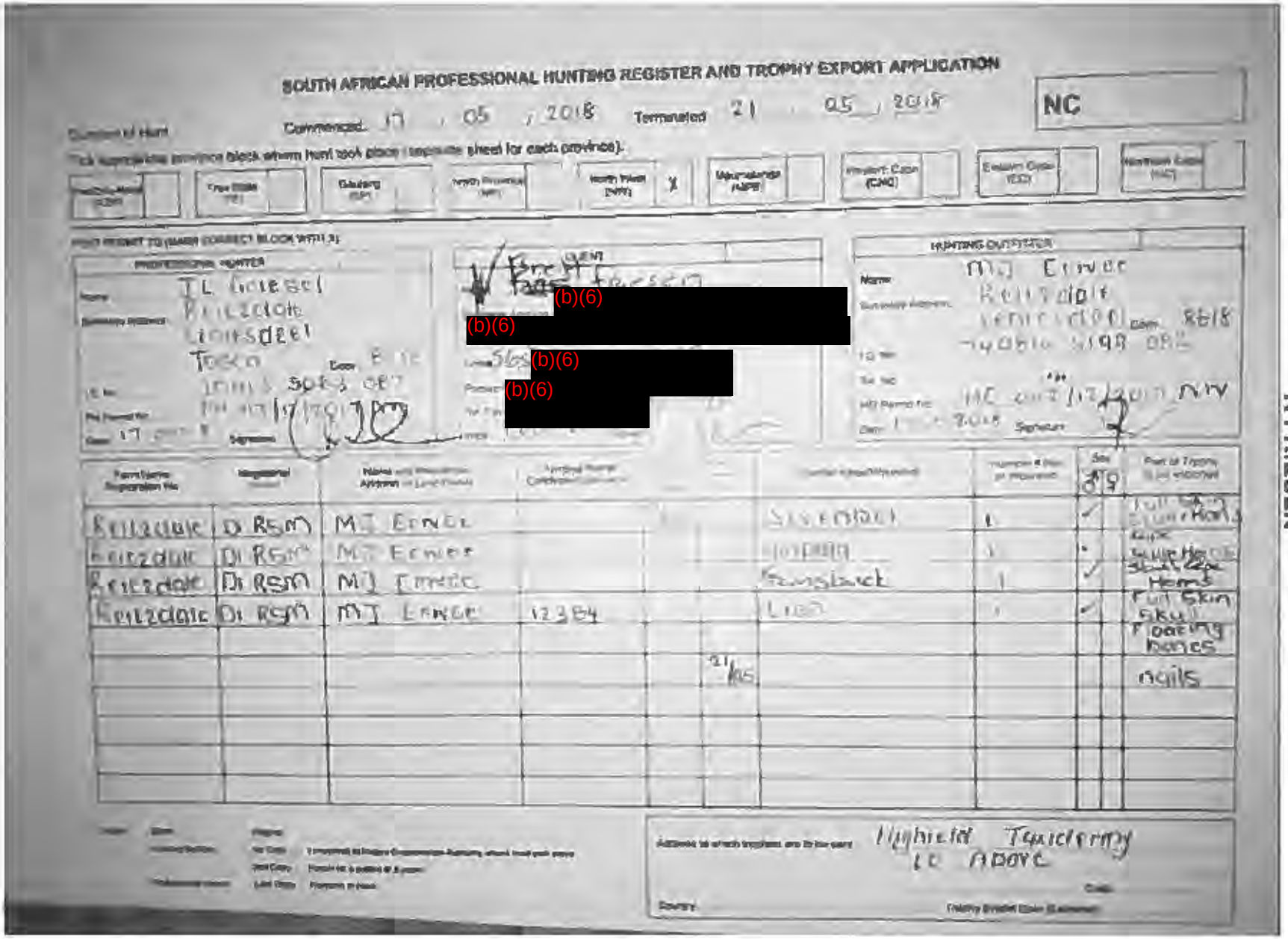
Signature of Issuing Office: _____ Date: _____

Signature of hunter: _____ Date: 11/05/2018

Signature of land owner: _____ Date: 11/05/2018

Signature of PH: _____ Date: 11/05/2018

Permit O 12344



SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Commenced 17 / 05 / 2018 Terminated 21 / 05 / 2018

NC

PROFESSIONAL HUNTER

Name IL Friesel

Business Address Reitzdale Lichtsdeel Tosca

HUNTING OUTFITTER

Name MJ Ermer

Reitzdale

Farm Name / Registration No.	Designation	Name and Residential Address of Client	Permit No.	Number of Trophies per Species	Sex ♂	Sex ♀	Part or Trophy Exported
Reitzdale	D RSM	MJ Ermer		Steenbok	1	✓	Full Skin, Skull, Horns
Reitzdale	D RSM	MJ Ermer		Impala	1	✓	Full Skin, Skull, Horns
Reitzdale	D RSM	MJ Ermer		Rooibuck	1	✓	Full Skin, Skull, Horns
Reitzdale	D RSM	MJ Ermer	12384	Lion	1	✓	Full Skin, Skull, Floating bones
				21/05			nails

Address to which trophies are to be sent: Highveld Taxidermy CC ABOVE

Country

Date

We want to give our clients a good hunting experience in a very large game reserve.

Feel free to ask more questions.

Sincerely
Hans de Klerk
DE KLERK SAFARIS
www.dksafaris.com

I will try and answer the questions under section 9 to the best of my ability.

Question 9 b. We paid R2 300 to the government for the lion hunting license. At the time and exchange rate it translates to about $200.
I do not know what the government is doing with the money. It must be a substantial amount because in 2015 before USA stopped the importation of lion trophies there were over 2000 lion hunting licenses issued just in that year in Northwest province alone. You will get more information as to what the government is doing with the money from SAPA (South African Predator Association). I know that SAPA does have a conservation fund that we all contribute to (R10 000 per lion hunted) and that PHASA wanted to donate the money to the government's conservation fund with the one provision that the money will only be used for lion research and conservation. The South African government did not want to (or could not) give us (SAPA) the guarantee so we did not transfer the money to the government. So we are sitting with more than R2 million in a conservation fund. The SAPA conservation fund has already successfully completed numerous lion conservation projects. They will be better suited to give you more information regarding that.
Regarding the trophy fee on lions - I am not sure what Mr Rogers paid for his lion trophy fee as he paid Bobby Hansen who was the middleman PH who brought Mr Arky Rogers to us.
I would assume Mr Rogers paid somewhere between $12 000 and $18 000 for his lion trophy fee. A big portion of that money is spent on running my own lion breeding project. I have 3 different lion breeding projects at three different locations. The reason for that is in case a disease break out at one place the other two will hopefully be not affected. In total I have about 130 lions. The upkeep of the breeding facilities. electrification of fences. feeding cost of the lions. veterinary expenses and salaries is very expensive.
Most of the trophy fees (80 %) of each lion is ploughed back into taking care of the lions. In the past I owned no lions but since I got involved with lion hunting in 2004 I started breeding with them and can say now that if it was not for hunting these 130 lions that I own would not have existed. The lion breeders all over South Africa own now more than 8 000 lions in captivity. If something must happen to the wild lion population like cat flu or TB and wipe out most of the wild lions the breeders will have a healthy reserve to restock the game reserves. So it is vital to keep these captive lions around not just to replenish the lion populations but also to provide a very wide spectrum of genetics in case there is inbreeding in some of the smaller game reserves. Also

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD NOV 14 2018

LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
ROGERS	EVERETT	W.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)		NONE	(b)(6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LAKE CITY	FLORIDA	32025	COLUMBIA	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
SAME AS ABOVE

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
—	—	—	—	—

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** [50 CFR 13.11(d)]

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6) 11-7-18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   SAME AS PGE. 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Hans De Klerk — +27-82-828-4899
   dksafaris@gmail.com

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo; AFRICAN LION
   b. Sex (if known).
   MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information: N/A

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   N/A

   b. Date wildlife is to be hunted:
   N/A

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   N/A

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   WILZENAU RANCH, TITLE DEED NO. T/812/2004
   BRAY, DR. RUTH SEGOMOTSI, MOMPATI DISTRICT
   MUNICIPALITY, NORTH WEST PROVENCE, SOUTH AFRICA

   b. Date wildlife was hunted:
   16/03/2018 to 21/03/2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

BOBBY HANSEN SAFARIS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

BULLSEYE TAXIDERMY, OPEN SEASON FARM
CORNER MELKRIVIER & STERKSTROOM ROAD
VAALWATER, 0530 SOUTH AFRICA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). SEE ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: BRETT PIDDUCK
Business Name: AFRICAN LEGACY LOGISTICS
Address: 40 KOKKEWIET STREET RANDPARK RIDGE
City: JOHANNESBURG
State/Province: 2169
Country, Postal Code: SOUTH AFRICA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
SEE ATTACHED

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
SEE ATTACHED

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
SEE ATTACHED

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

N/A

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b)(6) Date: 11-7-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

WE WILL BE USING COPPERSMITH GLOBAL LOGISTICS
IN ATLANTA, GA (ph. no. 404-366-1650)

114 Southfield Parkway
Suite 170
Forest Park, GA 30297
(Contact person: Tammy Lewis)

* Question [redacted] 7, (on permit Import Application)

read
Department
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr Mmabo & Nooid
Mini Garona Complex
Private Bag x 34
Vryburg
8601

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel +27 (53) 928 0644
Fax +27 (86) 511 4213
atalakasi@nwpg.gov.za

ORDINARY PERMIT: O 12410
(ORDINARY TROPHY OR PARTS TRANSPORT PERMIT CONDITIONS)

This permit authorises the transport of the **Trophy or parts** of the animal of the hunted animal from the venue of hunting to the approved venues of activity as specified on the permit.
This permit does not authorize the **selling**, **possession**, **exporting**, **importing** of the **Trophy** or part/s specified on the permit.
This permit is not transferrable.

PLEASE OBSERVE PERMIT CONDITIONS AT ALL TIMES

Ms. A.V Talakasi
Permit Officer
Biodiversity Management
Dr. Ruth Segomotsi Mompati District
North West Province

Department of Rural, Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2018 -02- 08
Private Bag x 34 Vryburg 8601
NORTH WEST PROVINCE

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

№ 26528

Duration of Hunt Commenced 16 / 03 / 2018 Terminated 01 / 03 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Northern Province (NP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CWC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER	CLIENT	HUNTING OUTFITTER
Name JC de Klerk	Name Everett W Rogers	Name JC de Klerk
Business Address PO Box 53	Permanent Postal Address (b)(6)	Business Address PO Box 53
Brey	(b)(6) Lake City	Brey Code 8550
Code 8550	Code 32063 Country USA	ID No 6810095087082
ID No 6810095087082	Passport No (b)(6)	Tel No 0728387402 Fax No
PH Permit No PH 0524/10/2017	Tel/Fax	PH Permit No P-019/10/2017
Date 21/03/2018 Signature	Date 21/3/2018 Signature	Date 21/03/2018 Signature

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Age (if available) Yrs	Parts of Trophy to be Exported
Driefontein 1000 Dist	D.P.S.N.	JC de Klerk Witzenau	01241O	21/3	lion	1		✓		Skull, Full skin

Copies Client: Original White; 1st Copy Pink — Forward to Nature conservation authority where hunt took place; Hunting Outfitter: 2nd Copy Blue — Retain for a period of three years; Taxidermist: 3rd Copy Green — Taxidermist; Professional Hunter: Last Copy Yellow — Remains in book

NB. A voluntary charge of $10 or C10 is levied for every trophy taken

Address to which trophies are to be sent: _____ Code: _____

Country _____ Trophy Export Date (Estimate) _____

ORDINARY PERMIT

Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004

PERMIT NUMBER: O 12410

NAME OF ISSUING AUTHORITY	
NAME	READ
ADDRESS	MINI GARONA OFFICES
ADDRESS	HOTOPO & NOORD STR
PROVINCE	VRYBURG NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	Everett W	ID NO.	(b)(6)
SURNAME	Rogers	PASSPORT NO	

	POSTAL ADDRESS	RESIDENTI
ADDRESS	(b)(6)	
ADDRESS		
ADDRESS		SAME
TOWN	Lake City	
POSTAL CODE	32425	
PROVINCE	USA	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	JC de Klerk
NAME AND SURNAME RESPONSIBLE PERSON	JC de Klerk
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Rand Uitzenau
PHYSICAL ADDRESS OF FACILITY	Brody
DISTRICT	Bi Rsm
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt on 13/02/2018 at 08h00 and June 13/02/2018 at 08h00 Hunt one (1) Captive bred male lion and transport the body to Taxidermist South Africa, Steenbrum Road Vryburg

NAME AND SURNAME OF PURCHASER / SELLER	
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	N/A

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	N/A

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	E W Rogers
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	JC de Klerk
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	JC de Klerk
WEAPON AND METHOD OF HUNTING	Rifle 375, Bow & Spear

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	N/A
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM	13/02/2018	TO	31/03/2018	
RECEIPT NUMBER	R2300.00 CA				

SIGNATURE OF ISSUING OFFICER

Department of [illegible] and Environmental Management
Dr Ruth Segomotsi Mompati District
2018 -02- 08
Private Bag x 33, Vryburg 8600
NORTH WEST PROVINCE

DATE STAMP

SIGNATURE OF PERMIT HOLDER

printed on the [illegible]

STANDARD PERMIT CONDITIONS

1. This permit is not transferable.
2. Any unauthorised alternation to this permit shall render it invalid.
3. This permit is subject to the provisions of any applicable law in force during the period of validity of the permit.
4. This permit is valid only within the province where it was issued
5. The holder of this permit shall, at the request of a person authorised in terms of applicable legislation so to demand forthwith produce such permit to such person
6. This permit shall be invalid until such time that it is signed by the permit holder.
7. This permit shall be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.
8. This permit may be withdrawn by an authorised person if the execution of any activity may be detrimental to the welfare of any wild animal or the safety of any person, provided that the permit holder is given notice of such intention and be granted the opportunity to appeal to such withdrawal
9. The prescribed fees paid for the issuing of this permit shall not be refunded.
10. If the holder of this permit contravenes or fails to comply with any condition or requirement to which this permit is subject, he or she shall be guilty of an offence
11. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

SPECIAL CONDITIONS

1. The issuing authority shall determine the species and restricted activities for which this permit will apply
2. If this permit applies to hunting, the holder of this permit must:
   a. Have a copy of this permit authorising the hunt, on his or her person during the hunt;
   b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating:
      (i) the permit number and date of issuance if the permit,
      (ii) the species, sex and number of animals hunted; and
      (iii) the location where the hunt took place.
   c. Return the original permit to the issuing authority forthwith after expiry of the permit.
   d. To be completed by landowner after completion of the hunt:

Name and signature of landowner: J.C. de Klerk

Species, number and sex of animal hunted: Eland X1 Male

Date / Period of hunt: 20 March 2018

read
Department
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr Molopo & Nooid
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213

Ordinary Permit No: O 12410

Please familiarise yourself with this terms and conditions.
The permit is not transferable.
This permit shall be subject to the provisions of any law in force during the period of validity of the permit.
The Hunter or Landowner who contravenes or fails to comply with any one of the conditions or requirements, to which this permit is subject, shall be guilty of an offence.
This permit only authorises **the hunting** of the animal during the day.
The Hunter will ensure that this permit is immediately available during the hunt.
The lion must be released in the hunting area a minimum of 96 hours prior to hunt and after receiving a permit to do so.
Information requested on this permit shall be done in ink and in print. False and unreadable information will cause this permit to be invalid.
No person shall hunt the wild animal or may be allowed by a landowner to hunt if the hunter did not beforehand acquire the necessary hunting skills and firearm training to: i) Ensure the safety of him or herself, other people and non targeted species. ii) Ensure a hunt which consists of generally accepted sound hunting ethics, a fair chase, the minimum cruelty and damage to the ecology of the hunting area.
No person may hunt when under the influence of alcohol or any substance that may deter his/her vision, judgement or in any way negatively affect his or her conduct.
A Hunter will immediately report the wounding of any wild animal to the landowner or his representative and will be responsible for the tracking down and killing thereof. If there is reasonable chance that the animal pose any threat to property or human life, the hunter and the land owner will immediately notify both the nearest Police station and the Local Nature Conservation district officer.
The landowner may at any time stop the hunt and withdraw the permit.
A Hunter should be accompanied by a designated official from this Directorate.
Animals may not be hunted under the influence of drugs.
Only animals that have been declared as wild by this directorate may be hunted. (No tame animals may be hunted)
No hunting with dogs is allowed.

Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. **A Nature Conservation Official must be present during the release of the lion.** **Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity.** **Tell: 053 928 0656 or \071 889 7867\082 446 1816**
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.
This permit is subjected to the approved Management plan of the facility. **The permit holder of this permit is binded by the contents of the approved Management Plan of this facility.** **Any contravention to the contents of the approved Management Plan of this facility will be an offence.** **The permit holders and the owner of this facility must report the escape, injury or death (to animals and to any human being) to the Vryburg Conservation office, as well as the local SAPS office within 24 hours of the incident**

Signature of Issuing Officer: _____ Date: 08/02/2018

Signature of hunter: _____ Date: 20/3/2018

Signature of land owner: _____ Date: 20 / March 2018

Signature of PH: _____ Date: 20 March 2018

Department of Rural Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2018 -02- 08 :
Private Bag x 34, Vryburg 8600
NORTH WEST PROVINCE

9a1

Panthera leo – Lion

Regional Red List status (2016)	**Least Concern***
National Red List status (2004)	Vulnerable D1
Reasons for change	Genuine change: Increased population
Global Red List status (2016)	Vulnerable A2abcd
TOPS listing (NEMBA) (2007)	Vulnerable
CITES listing (1977)	Appendix II
Endemic	No

*Conservation Dependent

Although Lions formerly occurred widely over sub-Saharan Africa, today there are only 10 Lion strongholds remaining, of which six occur in southern Africa (Riggio et al. 2013).

Taxonomy

Panthera leo (Linnaeus 1758)

ANIMALIA - CHORDATA - MAMMALIA - CARNIVORA - FELIDAE - *Panthera - leo*

Synonyms: *Felis leo* (Linnaeus 1758)

Common names: Lion, African Lion (English), Leeu (Afrikaans), Isilwane (Ndebele), Tau (Sepedi, Sesotho, Setswana), Ndau (Tshivenda), isiGidi, iNgwenyama (Xhosa), iNgonyama (Xhosa, Zulu), Nghala (Xitsonga), iBhubesi (Zulu)

Taxonomic status: Species

Taxonomic notes: The latest published phylogeographical study of Lions shows that the traditional split between Asian and African Lions as distinct subspecies is untenable (Barnett et al. 2014). Based on these results, the Cat Classification Task Force of the IUCN SSC Cat Specialist Group has provisionally proposed a different split into two subspecies, *P. l. leo* of Asia and West, Central and North Africa; and *P. l. melanochaita* from South and East Africa, with several regional management units identified as well (Haas et al. 2005; Bertola et al. 2011, 2015; Bauer et al. 2015).

Assessment Rationale

The Lion populations in South Africa declined substantially in the 19th century but have been stable or increasing over the past 20–30 years. The number of free-roaming mature Lions in South African large protected areas has increased from an estimated 800 in 2002–2004 to an estimated 1,286 in 2015. Furthermore, by including the entire area of transfrontier parks as interconnected and functional landscapes (over which South African conservation authorities have shared management jurisdiction), the total number of mature, free-roaming Lions within the assessment region is estimated to be 1,550. The number of small reserves containing Lions has increased from one in 1990 to at least 45 in 2013, which corresponds to an increase in Lion numbers from about 10 in 1990 to 500 (225 mature individuals) in 2013. Including Lions on small reserves yields a total mature population size of 1,775 individuals. Thus, Lion numbers in the assessment region comfortably exceed the threshold for D1 and the species does not qualify as threatened using the A or C criteria because the two major free roaming subpopulations have not declined over the past 20 years (3 generations). In Kruger National Park (KNP) alone, the number of Lionesses is estimated to have increased by 45% between 2005 and 2015. Thus we list the species as Least Concern.

This species would technically qualify for Near Threatened D1 if we exclude the managed subpopulations in small reserves and assess only the South African portions of the transfrontier parks (1,286 mature individuals). However, because the overall population is stable or increasing with no severe threats that could cause rapid decline, and because the reintroduced subpopulations on small reserves qualify as wild and free roaming, a Least Concern listing is most appropriate. Similarly, the regional criterion could be applied as the two major Lion subpopulations are connected to conservation areas in Botswana, Zimbabwe and Mozambique through transfrontier conservation areas. Thus, there has been a genuine increase in Lion numbers due to the success of

Recommended citation: Miller S, Riggio J, Funston P, Power RJ, Williams V, Child MF. 2016. A conservation assessment of *Panthera leo*. In Child MF, Roxburgh L, Do Linh San E, Raimondo D, Davies-Mostert HT, editors. The Red List of Mammals of South Africa, Swaziland and Lesotho. South African National Biodiversity Institute and Endangered Wildlife Trust, South Africa.

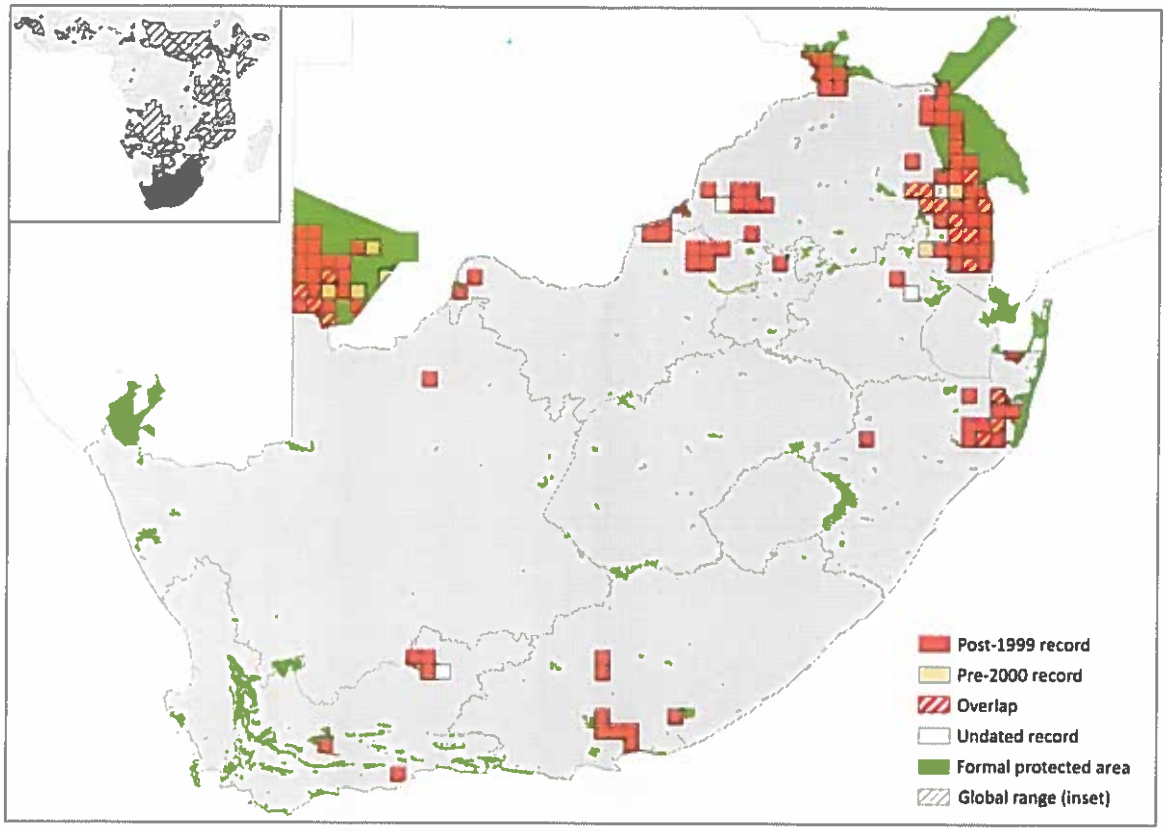


Figure 1. Distribution records for Lion (*Panthera leo*) within the assessment region

Table 1. Countries of occurrence within southern Africa

Country	Presence	Origin
Botswana	Extant	Native
Lesotho	Regionally extinct	Native
Mozambique	Extant	Native
Namibia	Extant	Native
South Africa	Extant	Native and reintroduced
Swaziland	Extant	Reintroduced
Zimbabwe	Extant	Native

transfrontier conservation areas and private protected area expansion.

There are no major current threats to Lions in the assessment region. While the trade in Lion bones to East–Southeast Asia has been cited as a potential threat in South Africa, evidence suggests that the trade is not adversely impacting on wild Lion subpopulations in South Africa because the skeletons are almost all a by-product of the sizeable trophy hunting industry, and Lions that are hunted in South Africa are almost exclusively captive-bred (which are excluded from this assessment). However, this situation needs to be closely monitored (especially elsewhere in Africa where the scale of the bone trade is largely unknown) and the assessment re-evaluated if new data become available that indicates that the bone trade is a threat to wild Lions. Currently, key interventions include the formulation and adoption of a metapopulation plan (small, fenced subpopulations require greater management input and coordination) and protected area expansion (especially transfrontier conservation areas).

Regional population effects: Although the range is mostly fragmented within the assessment region, there is connectivity and dispersal between subpopulations within Kgalagadi Transfrontier Park and Great Limpopo Transfrontier Park. There is also dispersal across the Botswana and South African border at the Greater Mapungubwe Transfrontier Park. Thus, there is potential for immigration.

Distribution

Lions originally roamed freely across most of South Africa but hunting and changes in land use (particularly farming) devastated Lions between the late 1800s and early 1900s and restricted them to large national parks by the middle of the 20th century (Nowell & Jackson 1996). For example, Lion became regionally extinct in the Eastern Cape by 1879 (Skead 2007). The fate of Lions in the Northern Cape is typical of many parts of the country: based on the average pride size of 11 individuals recorded in the dune-savannah of Kgalagadi Transfrontier Park (KTP) (Funston 2011), at least 1,492 Lions may have resided in the Northern Cape before the species was hunted to near local extinction in the 1800s. Lion disappeared from regions such as Namaqualand, Bushmanland, Karoo, Tankwa-Karoo, the Kimberley region and north of the Orange River. At one point, Lions survived only in the national park that now forms part of the KTP (*viz* Kalahari Gemsbok National Park), where they have been protected since 1931. Since the 1990s, however, Lion prides have been established on three

private properties in the Kalahari region of the Northern Cape (north of the Orange River). Lions have also been reintroduced into Swaziland: Swaziland's last resident Lion was reputedly seen by King Sobhuza II in the late 1950s at Hunter's Rock in Hlane National Park (Monadjem 1998). Subsequently, a male and two females were introduced from KNP to Hlane National Park in 1994 (Monadjem 1998).

Generally, the expansion of private game reserves, especially since the early 1990s, has reclaimed lost ranges for Lions and they currently occur in isolated subpopulations in all provinces of South Africa, except for the Free State (Hayward et al. 2007; Hunter et al. 2007; Slotow & Hunter 2009; Miller et al. 2013; Williams et al. 2015a). However, these subpopulations are highly fragmented, with over 45 "small" (< 1,000 km²) reserves having reintroduced Lion (Miller et al. 2013). There is currently a push to develop a metapopulation management plan to reduce the effects of fragmentation (Miller et al. 2013). Although the subpopulations on private reserves occur in fenced areas, some of which are smaller than the average range that would be required under natural conditions (but see Hayward et al. 2009), these subpopulations are all considered free-roaming and have access to large and varied prey populations (for example, Power 2002, 2003; Slotow & Hunter 2009).

This species still occupies only a small part of its former range in South Africa and they now persist on *c.* 40,000 km² as compared to 1.22 million km² historically. Lions are almost exclusively found in fenced areas in South Africa (there is only a very small free-roaming subpopulation in northern Limpopo bordering Botswana and Zimbabwe – this probably accounts for fewer than 20 animals). The current area of occupancy (41,745 km²) has been determined by summing the areas of the fenced reserves where Lions occur. The largest proportion comprises a few large transnational or provincial protected areas (33,200 km², *c.* 80%), with the remainder made up of 45 small fenced private or state reserves with a combined area of *c.* 8,500 km². The transnational protected areas are all fenced on the South Africa side, but open to neighbouring countries which have varying levels of fencing. Some reserves may have dropped internal fences since the last data were collected and so have increased their individual size and there may be one or two new reserves that have not been included, but this number should be reasonably representative. The smaller reserves (< 1,000 km²) complement the conservation value of larger reserves and have greatly helped to expand the area of occupancy for Lions. However, the small, fenced populations (many of which support fewer than 20 individuals), require greater management input and coordination than those populations in transfrontier parks (Miller et al. 2013).

Population

Lion numbers have been dropping dramatically across the African continent (Bauer et al. 2015). However, in South Africa, the Lion population is stable or increasing in major reserves and increasing through the addition of small reserves or through the formation of conservancies (Table 2). There are an estimated 3,490 free-roaming Lions in South Africa, including transfrontier zones; and 2,876 in South African conservation areas alone. Of these, there are 1,775 mature Lions, using a 50% mature population structure evident in large reserves (Smuts 1976; Mills et al. 1978); and 1,511 in South African conservation areas alone. If we use the total formally protected mature population of Lions (1,775), it represents 5–9% of the global mature population of 23,000–39,000 Lions (Riggio et al. 2013; Bauer et al. 2015).

The conservation success of the formally protected population is due largely to the transfrontier parks (established in the early 2000s) that have created resilient and self-sustaining Lion subpopulations. The Great Limpopo Transfrontier Park subpopulation (estimated at *c.* 2,000 individuals in 2013; 2,311 individuals if the private conservancies open to KNP on the western boundary are included), which represents 50% of the free-roaming Lion population, has remained stable or has slightly increased over the past 30 years (Ferreira & Funston 2010), where the KNP numbers have reached *c.* 1,700 individuals. Recent surveys, using 240 call-up stations distributed randomly throughout KNP, indicate the subpopulation has increased over the past decade from 1,684 (95% confidence intervals 1,617–1,751) in 2005 to 1,803 (95% confidence intervals 1,715–1,891) individuals in 2015 and.

Table 2. Current subpopulation numbers of Lion (*Panthera leo*) in South Africa and surrounding transfrontier areas. All counts were made between 2008 and 2013.

Location (sub-location)	Total Lions (South Africa only)	Number mature Lions (South Africa only)	Reference
Great Limpopo Transfrontier Park (Kruger National Park)	2,000 (*c.* 1,700)	1,060 (*c.* 900)	Ferreira & Funston 2010; Smuts 1976
Associated Private Nature Reserves (Greater Kruger National Park)	300	160	Funston 2004; Smuts 1976
Kgalagadi Transfrontier Park Total (South Africa only)	520 (248)	255 (167)	Ferreira et al. 2013; Funston 2011; S. Ferreira unpubl. data
Greater Mapungubwe Transfrontier Conservation Area (South Africa only)	~50 (10)	25 (5)	Funston 2010
Hluhluwe–iMfolozi Park	120	54	D. Druce pers comm. Feb 2014; 45% from small reserve data for mature Lions
Total excluding small reserves	**2,990 (2,376)**	**1,550 (1,286)**	
Small reserves	500	225	Miller et al. 2013
Total including small reserves	**3,490 (2,876)**	**1,775 (1,511)**	

for adult females specifically, from 415 (95% confidence intervals 380–450) to 604 (95% confidence intervals 515–693) (S. Ferreira unpubl. data).

Similarly, the South African side of the KTP has been fairly stable since the first population estimate in 1976 of 140 Lion, ranging between 108 and 181 (Funston 2001, 2011), and KTP overall reached over 500 individuals in 2010 (Ferreira et al. 2013). Recent mark-recapture estimates for the South African side of KTP may indicate an increasing subpopulation, where the total number of individuals is estimated to be 246 (95% confidence intervals 238–256), and the number of mature individuals is estimated to be 167 (95% confidence intervals 160–177) (S. Ferreira unpubl. data). The subpopulation in the Greater Mapungubwe Transfrontier Conservation Area (GMTFCA) contains Lions on the De Beers Venetia Limpopo Nature Reserve, which does require active management as they are enclosed. However, the rest of the Lions in the GMTFCA are completely free-roaming (not contained by fences) and so are not managed, although they are constantly under threat from human–wildlife conflict. The subpopulation in Hluluwe-iMfolozi Park (HiP) has increased from two founders in 1956 and 60 mature individuals in 1986 to a stable population of approximately 120 in 2014 (D. Druce unpubl. data), with new individuals being reintroduced in the late 1990s to mitigate potential inbreeding (Trinkel et al. 2008).

Lions have also been extensively reintroduced onto small reserves (including national, provincial and privately protected areas), having increased from one in 1990 to 45 in 2013, with a corresponding increase in numbers from 10 to *c.* 500 (Miller et al. 2013; Miller & Funston 2014). Around 45% of these Lions are mature (225 individuals), as opposed to 50% of Lions in large national parks or transfrontier parks (1,400 individuals). All small reserve subpopulations are ecologically functional as, for example, they are large enough for social dynamics and hunting to continue unhindered, although some reserves may import prey stocks (Power 2002, 2003; Hayward et al. 2007). Thus, they may occasionally receive supplementary prey but are not fed and are not captive-bred Lions. Such subpopulations continue to grow and generally increase to the extent that management has become a necessity (Power 2003; Hayward et al. 2009; Slotow & Hunter 2009), although the addition of new reserves has slowed in the past five years (Miller & Funston 2014). The reasons for this are varying: for example, in Mpumalanga, development and infrastructure conflict with protecting more land for conservation, while in the Northern Cape high costs of land and predator-proof fencing inhibit further conservation efforts. This highlights the need to consolidate existing private reserves into conservancies and create larger, more ecologically-resilient populations (Di Minin et al. 2013). Secondly, the management of small reserve subpopulations requires a metapopulation plan to ensure they do not become a threat to genetic integrity through inbreeding (Miller et al. 2013; Miller et al. 2015). Genetic studies indicate that the southern African Lion would originally have constituted one large panmictic population (Barnett et al. 2006). However, there is very limited "free" movement of Lion between separate subpopulations today, which necessitates metapopulation management. This managed population may need to be occasionally supplemented with Lions from the larger protected areas (for example, KNP).

The total current (2013) mature population size ranges from 1,286 to 1,775 depending on the inclusion on the entire transfrontier conservation areas and small reserves (Table 2). Generation length is calculated as 6.5 years (Bauer et al. 2015), and the core population in the largest protected areas have remained stable or have increased over three generations. In southern Africa overall (Botswana, Namibia, South Africa and Zimbabwe), the population is inferred to have increased by 12% over three generations, whereas outside these countries the population has declined by 43% over the past 21 years (Bauer et al. 2015). The strongholds for Lions (Great Limpopo Transfrontier Park, KTP and HiP) provide enough mature individuals to exceed the D threshold alone.

In addition to wild Lions, there are many captive-bred Lions in most provinces, especially the Free State and North West provinces (Lindsey et al. 2012; Power 2014; Williams et al. 2015a). According to a study by Williams et al. (2015a), there are close to 6,000 Lions in captivity in approximately 70 breeding facilities. Although such Lions do not contribute to the wild and free-roaming population, they may serve as a significant buffer to threats facing the wild population by being the primary source of trophy hunting and derived products (SANBI 2012; Lindsey et al. 2012; Williams et al. 2015a).

Current population trend: Increasing

Continuing decline in mature individuals: No

Number of mature individuals in population: 1,511–1,775

Number of mature individuals in largest subpopulation: > 500

Number of subpopulations: 49

Severely fragmented: Yes. Most subpopulations are in small fenced reserves that require active metapopulation management.

Habitats and Ecology

Lions have a broad habitat tolerance and are only absent from tropical rainforest and the interior of the Sahara Desert (Nowell & Jackson 1996). They once lived across Eurasia, but now only a remnant population of a different subspecies (*Panthera leo persica*) survives in India. Lions are largely found in the savannah biome of Africa, which is broadly defined as those areas that receive between 300 and 1500 mm of rain annually, and encompass a wide variety of habitats including grasslands, wetlands, dry woodlands and mosaics of all of these (Riggio et al. 2013). They do locally exist in the Namib Desert in Namibia (Bauer & van Der Merwe 2004). Once extirpated from the

tropical thicket biome of the Eastern Cape in South Africa, Lions have recently been successfully reintroduced (Hayward et al. 2007).

Although Lions drink regularly when water is available, they are capable of obtaining their moisture requirements from their prey and even plants (such as the tsama melon in the Kalahari Desert), and thus can survive in very arid environments as they are water-independent (Green et al. 1984). Medium- to large-sized ungulates (190–550 kg, including antelopes, zebra and wildebeest) are the bulk of their prey (Hayward & Kerley 2005), but depending on circumstances, Lions will take almost any animal, from rodents to a rhinoceros. They also scavenge, displacing other predators (such as the Spotted Hyaena *Crocuta crocuta*) from their kills (Hayward 2006). Lions can only exist in areas with sufficient wild prey, and seldom co-exist closely with man. Within their home ranges, Lions require habitats or locations that are suitable for hunting, resting, and breeding. They readily adapt to hunting in varied habitats generally having greater success when hunting in areas with longer grass or cover (Funston et al. 2001). Although landscape features may vary from area to area, Lions tend to select areas where prey is easier to catch, rather than areas where prey densities are highest.

Lions are the most social of the cats, with related females remaining together in prides, and related and unrelated males forming coalitions competing for tenure over prides (West & Packer 2013). Average pride size (including males and females) is four to six adults; prides generally break into smaller groups when hunting (Smuts 1976). Lions tend to live at higher densities than most other felids, but with a wide variation from 1.5 adults / 100 km² in southern African semi-desert to 55 adults / 100 km² in parts of the Serengeti. Small fenced reserves in South Africa had average densities below 10 adults / 100 km² (Miller & Funston 2014). Pride home ranges can vary widely even in the same region: for example, from 266 to 4,532 km² in the South African part of the KTP (Funston 2001), and 45 km² in the Ngorongoro Crater, Tanzania (Hanby et al. 1995). Home ranges also vary widely within South Africa and do not appear to be linked to reserve size (Lehmann et al. 2008). For example, home ranges can vary hugely within a reserve, as evidenced on Makalali where Lions had home ranges from 25 km² to 107 km² (Druce et al. 2004).

Key habitat for Lions is directly driven by the presence or density of preferred prey species rather than any particular vegetation types – other than those associated with their preferred prey. As such, the vegetation communities that support the preferred prey of Lions range from semi-desert (Kalahari) through savannah (Kruger/Okavango) and subtropical thicket (Addo). In South Africa, however, the predominant subpopulations all occur within the savannah biome in the northern parts of the country.

Ecosystem and cultural services:

- This species is a keystone species and an apex predator. For example, Lions were reintroduced to Addo Elephant National Park in part to substitute the need to cull overabundant herbivores (Hayward et al. 2007), thus performing an ecosystem service of top-down population control.
- Lions are extensively used for ecotourism and are a prominent member of the "Big 5" (Di Minin et al. 2012; Maciejewski & Kerley 2014).
- Lions have huge commercial value in the trophy hunting industry, though there is controversy over such practices.

Use and Trade

South Africa's international trade in Lion products is sizeable. Besides trophies and live Lions, South Africa has issued CITES permits to export 19 categories of Lion products since 1977 ranging from hair to handbags, feet, leather items and tails (Williams et al. 2015a). Since 1992, South Africa has issued CITES permits to export at least 7,474 trophies, with an average of 351 ± 303 per year. However, from 2002 that average has increased to 565 ± 275 trophies per year. The trophies are primarily derived from legally hunted captive-bred Lions, and hunting predominantly occurs in the North West (77% of hunts from 2004 to 2010), Eastern Cape (10% of hunts) and Free State (6% of hunts) provinces (Williams et al. 2015a). Exports of trophies originating in South Africa increased markedly from *c.* 2006.

Despite the sizeable trade of Lions in South Africa, trophy hunting and trade is a negligible threat as utilization appears to be sustainable and wild populations are either stable or increasing. No hunting is allowed in national or provincial parks, which collectively represent > 75% of the total wild Lion population. Furthermore, less than 5% of trophy hunts are sourced from wild populations (CITES Scientific Authority South Africa 2013). For example, Lindsey et al. (2012) reported that the South African hunting operators estimated the proportion of wild Lions hunted annually to be only 0.9 and 1.1% of the totals for 2009 and 2010 respectively. The majority of trophy hunting is performed on private wildlife ranches (53%) or on properties with captive-breeding facilities (42%), where there are at least 6,000 Lions kept in captivity in at least 149 facilities across South Africa (Williams et al. 2015a). Although this population does not contribute to the wild population under assessment, it may act as a buffer to the wild population (Lindsey et al. 2012), as well as contributing to the South African economy. Besides trophies, CITES permits have been issued to export large numbers of live Lions across the world, as well as skeletons and bones to east-southeast Asia. From 1992 to 2012, CITES permits to export almost 1,400 live Lions (predominantly captive origin from the North West Province) were issued, 16% of these were destined for southeast Asia (mostly Thailand), and reached a peak of > 280 Lions in 2010 (Williams et al. 2015a).

In 2005, the process to develop stricter regulations relating to the hunting of captive-bred Lions was initiated and the provisions came into effect in 2007. These stricter regulations in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004 (Act No 10 of 2004) and, more specifically, the Threatened or Protected Species (ToPS) regulations, proposed that captive-bred Lions could only be hunted if they were released into an extensive self-sustaining (or 'free-roaming') system for a 2-year period. This regulation was challenged twice in court by the South African Predator Breeders Association (SAPBA) and, in 2010, SAPBA were successful in having the two-year period declared invalid for Lions (Williams et al. 2015a). Consequently, provinces apply regulations as per their provincial ordinances or guidelines, and this self-sustaining period varies across the provinces (for example, 96 hours in the North West, 30 days in the Eastern Cape, and 24 months in the Limpopo Province) (Williams et al. 2015a).

Table 3. Use and trade summary for the Lion (*Panthera leo*)

Category	Applicable?	Rationale	Proportion of total harvest	Trend
Subsistence use	Yes	Low-scale traditional medicine use.	Minority	Stable
Commercial use	Yes	Trophy hunting and export of skeletons.	Majority	Increasing
Harvest from wild population	Yes	Low incidences of poaching or illegal hunting.	< 5%	Stable
Harvest from ranched population	Yes	Occasional trophy hunting.	< 5%	Stable
Harvest from captive population	Yes	Extensive trophy hunting and exportation of parts for international markets.	95%	Increasing

In 2006 the IUCN SSC African Lion Working Group cautioned against allowing a legal trade in Lion bones based on a concern that a legal trade would be unable to meet the substantial demand for Lion bones in China. This demand was allegedly to replace tiger bones in Asian traditional medicines and tonics. According to Williams et al. (2015a), there is evidence that the legal trade in Lion bones had started by 2008. Before 2008, the only record of South Africa issuing CITES permits to export Lion skeletons was for three units to Denmark in 2001. However, Lion bone exports from South Africa have increased dramatically since 2008. From 2008 to 2011, the official number of skeletons legally exported with CITES permits totalled 1,160 skeletons (about 10.8 tonnes of bones), 573 of them in 2011 alone, with 91% of them destined for Lao People's Democratic Republic. The North West, Free State and Eastern Cape provinces, all home almost exclusively to captive-bred Lions, were the only provinces to issue export permits. Sixty-seven percent of the skeletons recorded on the export permits were from the North West and 25% from the Free State (Williams et al. 2015a). Lion bones are a sustainable by-product of the trophy industry and there was no evidence that any of these skeletons were obtained from wild Lions (Williams et al. 2015a). However, the longer-term sustainability of this practice is questionable, particularly if Asian consumers begin demanding wild rather than farmed or captive-bred products as consumer surveys indicate they prefer (Gratwicke et al. 2008).

Although there are no specific figures on illegal trade of Lions in South Africa, provincial conservation authorities indicate that illegal use or trade in Lion body parts and products is generally limited to negligible or non-existent. Furthermore, any illegal trade in Lions and their body parts usually involves restricted activities for which offenders are not in possession of a permit to breed, keep, hunt, catch, sell or export a live Lion or part thereof (Williams et al. 2015a). There is no known illegal trade in Lion in Gauteng, KwaZulu-Natal or the Eastern Cape and illegal utilisation of Lion within South Africa's national parks is negligible. Illegal trade in captive-bred Lions within North West Province is suspected to take place, as this province has the most facilities and is quite difficult to regulate. There are no reported records of illegal hunting of Lions in the Northern Cape. Any illegal hunting or trade in wild Lions is only likely to occur along the border between the Northern Cape and Botswana between Askham in the west and McCarthy's Rest in the east, a stretch of approximately 200 km, while Lions do also enter into the North West Province across the Molopo River (Power 2014).

Lions are used for traditional medicine and various trade studies conducted in Gauteng and KwaZulu-Natal urban traditional medicine markets have documented their body parts (usually bones and 'fat') for sale, but the quantities are small and the incidences sporadic (Whiting et al. 2011; Williams et al. 2015a). The expansion of human settlements on the western boundary of the KNP in Mpumalanga has been cited as a reason for the recent increase in Lion poaching for African traditional medicine (CITES Scientific Authority South Africa 2013), but these incidences too are sporadic. There have been anecdotal reports, however, that traditional healers living in areas adjacent to KNP acquire Lion body parts from healers working for SANParks – especially when dead animals become available (Williams et al. 2015a).

Overall, the private sector has been positive for the wild population. Some Lions have been removed from KTP to stock small reserves (for example, 6 in 2003 for Addo Elephant National Park), but this was not detrimental to the population. No Lions have been moved from KNP to small reserves. New reserves currently source their Lions from within the metapopulation. Some excess Lions from the metapopulation have ended up in captive facilities, but not vice versa. Thus, the system is self-contained and there is little leakage between the captive-bred, metapopulation and wild populations. The exception is the Mapungubwe area subpopulation where Lions get through the fences and onto managed properties (where legal hunting occurs) and are free-roaming on farmland (where they are occasionally killed by farmers) and cross international borders. There have not been extensive studies on whether this has any impact on the overall subpopulation in that area. The private sector too has greatly increased the commercial value of this species through trophy hunting. However, Lions are being increasingly reared in captivity for captive-bred hunting (*sensu* canned hunting), which negates the conservation value of these subpopulations. The majority of private wildlife ranches that contain subpopulations of conservation value are those large private nature reserves or conservancies who use Lions as an ecotourism drawcard.

Threats

There are no major threats to Lions in the assessment region. However, human-wildlife conflict and associated persecution may threaten local subpopulations, especially in the Mapungubwe region, and along protected area edges (*sensu* Wittemyer et al. 2008). Conflict on the borders of the KNP is relatively minor. For example, over the past 11 years, *c.* 135 complaints relating to wild animals killing livestock in the Nsikazi district adjacent to KNP have been received by Mpumalanga Tourism and Parks Agency (G. Camacho unpubl. data). Similarly, the conservation authority in North West Province reported two Lions shot for killing cattle in 2009 and one female

Lion shot in 2011, but it was never confirmed if these were wild or escapees from a captive facility, though these occurrences are rare in this province (Power 2014). In Gauteng, there is limited human–Lion conflict, which is closely managed by the authorities of the Dinokeng Game Reserve. As all Lions in the Eastern Cape are kept in areas that are protected with adequate fencing, there have been no human-Lion conflicts reported nor any livestock killed by Lion.

Lions are also accidentally killed in snares laid by bushmeat poachers. Poaching, snaring and poisoning of Lions remain a threat to free-roaming Lions in the Limpopo and Mpumalanga provinces. According to the IUCN SSC African Lion Working Group, Lions are lured from KNP into Mozambique and also across the Crocodile River by farmers for trophy hunting purposes. The illegal killing of problem animals and the illegal hunting of Lion for their skins are thought to be minor threats in KwaZulu-Natal Province.

Disease has also been a threat to free-roaming Lion population, especially Bovine Tuberculosis in KNP and HiP. This is especially prevalent for inbred subpopulations (Trinkel et al. 2011), which is exacerbated by the fragmented and isolated nature of most subpopulations within the region. Bovine Tuberculosis is not spread within Lion subpopulations through intraspecific interactions, it can only be sustained in the population through infected prey, particularly buffalo (Maruping-Mzileni 2015). The high numbers of domestic and feral dogs and cats associated with the expanding human population bordering the western side of KNP also enhances the possibility of transmission of diseases such as canine distemper and rabies. Within KNP, Bovine Tuberculosis has not had any detectable impacts on the Lion population and disease threats within this national park are minimal (Ferreira & Funston 2010) and research demonstrates that infections of Bovine Tuberculosis and Feline Immunodeficiency Virus do not co-vary (Maas et al. 2012). Future threats to Lions in KwaZulu-Natal Province are speculated to be disease, primarily Bovine Tuberculosis and Canine Distemper Virus.

Although prey-base depletion and habitat loss is listed as a major threat to the global Lion population (Bauer et al. 2015), the expansion of small, private protected areas with high prey numbers has counteracted this threat on a local scale in South Africa (Miller et al. 2013). Conversely, artificially high Lion numbers negatively impact the abundance of other predators and need to be managed so as not to affect overall diversity.

The popular media emphasises the threat of trophy hunting on Lions in South Africa, but the overwhelming majority of trophy hunts are taken from the captive-bred population, which leaves the wild and free-roaming population largely unscathed (SANBI 2012). Lindsey et al.

Table 4. Threats to the Lion (*Panthera leo*) ranked in order of severity with corresponding evidence (based on IUCN threat categories, with regional context)

Rank	Threat description	Evidence in the scientific literature	Data quality	Scale of study	Current trend
1	*5.1.3 Persecution/Control*: indiscriminate killing to protect livestock.	-	Anecdotal	-	Stable, but minimal impact on overall population.
2	*2.1 Annual & Perennial Non-Timber Crops*, *2.3 Livestock Farming & Ranching* and *1.1 Housing & Urban Areas*: loss of habitat from agricultural and residential expansion. Current stresses *2.3.5 Inbreeding* and *2.1 Species Mortality*: inbreeding due to fragmented subpopulations and increased persecution rates.	Trinkel et al. 2011	Empirical	Local	Fragmentation: increasing with new reserves, but minimal in last 5 years. Inbreeding: potential to increase with more small reserves, but metapopulation plans are addressing this.
3	*8.1 Invasive Non-Native/Alien Species/ Diseases*: Bovine Tuberculosis and Feline Immunodeficiency Virus outbreaks / epidemics.	Ferreira & Funston 2010	Empirical	Local	Stable in Kruger National Park; controlled on small reserves.
		Trinkel et al. 2010	Empirical	Local	
		Trinkel et al. 2011	Empirical	Local	
		Maas et al. 2012	Empirical	Local	
4	*5.1.2 Hunting & Collecting Terrestrial Animals*: incidental mortality from snaring during bushmeat hunting.	-	Anecdotal	-	Increasing, but minimal impact on overall population.
5	*5.1.1 Hunting & Collecting Terrestrial Animals*: trade in Lion bones which are sourced predominantly from captive-bred population.	Williams et al. 2015a	Empirical	National	Increasing, but no discernible impact on wild population yet.

(2012) warn that if the captive-bred Lion industry were to become increasingly regulated, in part due to pressure from animal welfare activists, the demand for wild Lion trophies would increase and thus the management of wild Lions would need increased regulation, stricter penalties and greater enforcement. Thus, the captive-bred population effectively buffers the wild population and reduces the associated conservation costs (Lindsey et al. 2012). Similarly, while the trade in Lion bones to east-southeast Asia has been cited as a potential threat in South Africa, evidence suggests that the trade is not adversely impacting wild Lion subpopulations in South Africa because the skeletons are almost all a by-product of the sizeable trophy hunting industry, and Lions that are hunted in South Africa are almost exclusively captive-bred (Williams et al. 2015a). In addition to wild-hunting, there are few records of Lion poaching – especially at a level that could supply the sizeable bone trade (Williams et al. 2015a). There are concerns, however, that the trade in Lion bones to China and southeast Asia could stimulate demand for wild Lion bones and other felids (Lindsey et al. 2012), and thus this situation needs to be closely monitored (especially elsewhere in Africa where too little is known of the bone trade) and the assessment re-evaluated if new data become available that indicates that the bone trade is a threat to wild Lions within the assessment region.

Current habitat trend: Stable/increasing. The savannah biome is well protected and the current area of occupancy is expanding through private protected areas.

Conservation

While there are no pressing interventions necessary for large, formally protected areas, developing a management plan for reintroduced Lions on small reserves (< 1,000 km²) is the primary conservation intervention (Miller et al. 2013). The Lion Management Forum (LiMF) was formed in 2010 to develop such management guidelines. LiMF bases its recommendations on the premise that managers should try to mimic natural processes that have broken down in reserves, using proactive rather than reactive methods. Specifically, managers should attempt to reduce Lion subpopulation growth and thus reduce the number of excess Lions in the metapopulation; disease threats should be reduced through vaccination whenever animals are translocated; and genetic integrity should be monitored throughout the metapopulation (Miller et al. 2013). As part of the metapopulation strategy, new sites for reintroduction should be identified. Founder groups to new areas should be as large and genetically diverse as possible (Trinkel et al. 2010). Research demonstrates that inbred Lions are more susceptible to Bovine Tuberculosis and that translocating outbred Lions into the area can mitigate losses (Trinkel et al. 2011). However, care must be taken not to introduce new diseases into subpopulations through translocation. An adaptive management framework is thus needed to implement the guidelines developed by LiMF on reserves across the country. Ongoing monitoring of subpopulation responses to the management actions should improve management of Lions on small reserves in South Africa. This approach will provide a template for evidence-based conservation management of other threatened carnivores.

The second most important conservation strategy for all Lions, both within small reserves and those within transfrontier parks or large national parks, is protected area expansion. Plans for expanding the protected area system are underway in a number of provinces. Through the development of privately owned nature reserves in Gauteng, it is hoped that available habitat will expand in the near future and the Lion population will increase. A process has been initiated in North West Province to identify critical biodiversity areas for the expansion of the protected area system, which will also possibly involve reintroductions of further free-roaming Lion subpopulations. Similarly, a Park Expansion Strategy is currently being implemented by the Mpumalanga Parks and Tourism Agency and as the area of available habitat

Table 5. Conservation interventions for the Lion (*Panthera leo*) ranked in order of effectiveness with corresponding evidence (based on IUCN action categories, with regional context)

Rank	Intervention description	Evidence in the scientific literature	Data quality	Scale of evidence	Demonstrated impact	Current conservation projects
1	*3.3.1 Reintroduction*: further translocation and reintroduction under a metapopulation plan to increase occupancy and reduce the effects of inbreeding.	Trinkel et al. 2011	Empirical	Local	> 30% of inbred Lions died from Bovine Tuberculosis or malnutrition compared with < 2% of the translocated Lions and their offspring.	Lion Management Forum
2	*1.1 Site/Area Protection*: protected area expansion, especially transfrontier areas, to increase subpopulation resilience.	Miller et al. 2013	Review	National	30% increase in Lion numbers over 10 years.	Lion Management Forum
3	*3.1.3 Limiting Population Growth*: sustaining Lion numbers at ecological densities.	Trinkel et al. 2010	Empirical	Local	Saturated subpopulations show lower growth rates.	Lion Management Forum
4	*3.2 Species Recovery*: pre-emptive vaccination prior to translocation/ reintroduction.	-	Anecdotal	-	-	Lion Management Forum
5	*2.1 Site/Area Management*: site-specific conflict mitigation measures, including the use of livestock guarding dogs.	Rust et al. 2013	Indirect	Local	Livestock depredation rates reduced.	-
		McManus et al. 2015	Indirect	Local		

for Lion is secured, reintroduction of Lion will be possible. There are currently four areas that could support healthy Lion populations in Mpumalanga, including the Loskop Dam Nature Reserve area, the Nkomazi Wilderness area, the Lydenburg/Burgersfort/Steelpoort area and the Andover area in the Lowveld. Although, in order to realize this, current development trends in these areas will need to be managed. While fencing has been shown to be effective in reducing conflict and increasing Lion subpopulation size (Packer et al. 2013), it also increases isolation, and thus, while small fenced reserves are necessary, continued transfrontier protected area expansion is necessary to create more resilient and self-sustaining subpopulations.

The use of livestock guarding dogs and improved livestock husbandry should be trialled in the Mapungubwe region to reduce conflict between the small free-roaming subpopulation and local communities (Marker et al. 2005). While various pilot projects have been established in Limpopo, North West, Northern and Western Cape provinces, little research has been done about their overall effectiveness within the assessment region, especially for Lions. Preliminary findings suggest that livestock guarding dogs can decrease depredation by 69% (McManus et al. 2015).

Recommendations for land managers and practitioners: The lack of a sound metapopulation management plan for these small reserves undermines the conservation value of the privately protected subpopulations and increases the risk of inbreeding (Björklund 2003). To redress this, the LiMF was established to draft a metapopulation management strategy for Lions (Miller et al. 2013). LiMF is run by independent individuals interested in Lion management on small reserves and has been very successful in providing a forum for managers, scientists and, more recently, government organisations, to discuss Lion management issues unique to small reserves. Landowners and interested stakeholders are encouraged to participate.

Similarly, the Department of Environmental Affairs has developed a Biodiversity Management Plan (BMP) for Lions in terms of the National Environmental Management: Biodiversity Act, 2004. The BMP is aimed at ensuring the long-term survival of the species in nature and will contribute towards the achievement of the recommendations of the Eastern and Southern African Lion Conservation Strategy (the regional conservation strategy compiled by the IUCN SSC Cat Specialist Group, 2006).

Research priorities:

- Comprehensive contraception study to test the efficacy and effects (physiological and behavioural) of chemical and surgical contraception of Lionesses to reduce growth rates on small reserves.
- Effects of Bovine Tuberculosis on tenure and male take over in Lions of KNP.
- Quantifying and monitoring the effects of Lion bone trade on the wild Lion population within the assessment region.
- Exploring interventions to reduce human-Lion conflict.

Encouraged citizen actions:

- Contribute to citizen science projects within protected areas (by reporting sightings locations and pride numbers), and report sighting data on virtual museum platforms (for example, iSpot and MammalMAP) outside of protected areas.
- Support protected areas and nature reserves over Lion parks or captive centres, as the latter institutions do not have conservation value for Lions (Hunter et al. 2013).

Data Sources and Quality

Table 6. Information and interpretation qualifiers for the Lion (*Panthera leo*) assessment

Data sources	Census (literature), field study (literature, unpublished)
Data quality (max)	Observed
Data quality (min)	Estimated
Uncertainty resolution	Total count, confidence intervals
Risk tolerance	Evidentiary

References

Barnett R, Yamaguchi N, Barnes I, Cooper A. 2006. Lost populations and preserving genetic diversity in the lion *Panthera leo*: implications for its ex situ conservation. Conservation Genetics 7:507–514.

Barnett R, Yamaguchi N, Shapiro B, Ho SY, Barnes I, Sabin R, Werdelin L, Cuisin J, Larson G. 2014. Revealing the maternal demographic history of *Panthera leo* using ancient DNA and a spatially explicit genealogical analysis. BMC evolutionary biology 14:70.

Bauer H, Packer C, Funston PF, Henschel P, Nowell K. 2015. *Panthera leo*. The IUCN Red List of Threatened Species 2015: e.T15951A79929984. Available from http://dx.doi.org/10.2305/IUCN.UK.2015-4.RLTS.T15951A79929984.en.

Bauer H, van Der Merwe S. 2004. Inventory of free-ranging lions *Panthera leo* in Africa. Oryx 38:26–31.

Bertola LD et al. 2011. Genetic diversity, evolutionary history and implications for conservation of the lion (*Panthera leo*) in West and Central Africa. Journal of Biogeography 38:1356–1367.

Bertola LD et al. 2015. Autosomal and mtDNA markers affirm the distinctiveness of lions in West and Central Africa. PloS One 10:e0137975.

Björklund M. 2003. The risk of inbreeding due to habitat loss in the lion (*Panthera leo*). Conservation Genetics 4:515–523.

CITES Scientific Authority South Africa. 2013. Information collated by the South African CITES Scientific Authority in response to a proposal to list African lion on the US Endangered Species Act. Unpublished report, South African National Biodiversity Institute, Pretoria, South Africa.

Di Minin E, Fraser I, Slotow R, MacMillan DC. 2012. Understanding heterogeneous preference of tourists for big game species: implications for conservation and management. Animal Conservation 16:249–258.

Di Minin E, Hunter LT, Balme GA, Smith RJ, Goodman PS, Slotow R. 2013. Creating larger and better connected protected areas enhances the persistence of big game species in the Maputaland–Pondoland–Albany biodiversity hotspot. PloS One 8:e71788.

Druce D, Genis H, Braak J, Greatwood S, Delsink A, Kettles R, Hunter L, Slotow R. 2004. Population demography and spatial ecology of a reintroduced lion population in the Greater Makalali Conservancy, South Africa. Koedoe 47:103–118.

Ferreira SM, Funston PJ. 2010. Estimating lion population variables: prey and disease effects in Kruger National Park, South Africa. Wildlife Research 37:194–206.

Ferreira SM, Govender D, Herbst M. 2013. Conservation implications of Kalahari lion population dynamics. African Journal of Ecology 51:176–179.

Funston PJ. 2001. Executive Summary of the Kalahari Transfrontier Lion Project. Endangered Wildlife Trust, Upington, South Africa.

Funston PJ. 2011. Population characteristics of lions (*Panthera leo*) in the Kgalagadi Transfrontier Park. South African Journal of Wildlife Research 41:1–10.

Funston PJ, Mills MGL, Biggs HC. 2001. Factors affecting the hunting success of male and female lions in the Kruger National Park. Journal of Zoology 253:419–431.

Gratwicke B, Mills J, Dutton A, Gabriel G, Long B, Seidensticker J, Wright B, You W, Zhang L. 2008. Attitudes toward consumption and conservation of tigers in China. PLoS One 3:e2544.

Green B, Anderson J, Whateley T. 1984. Water and sodium turnover and estimated food consumption in free-living lions (*Panthera leo*) and spotted hyaenas (*Crocuta crocuta*). Journal of Mammalogy 65:593–599.

Haas SK, Hayssen V, Krausman PR. 2005. *Panthera leo*. Mammalian Species 1–11.

Hanby JP, Bygott JD, Packer C. 1995. Ecology, demography, and behaviour of lions in two contrasting habitats: Ngorongoro Crater and the Serengeti Plains. Pages 315–331 in Sinclair ARE, Arcese P, editors. Serengeti II: Dynamics, Management, and Conservation of an Ecosystem. The University of Chicago Press, Chicago, USA.

Hayward MW. 2006. Prey preferences of the spotted hyaena (*Crocuta crocuta*) and degree of dietary overlap with the lion (*Panthera leo*). Journal of Zoology 270:606–614.

Hayward MW et al. 2007. The reintroduction of large carnivores to the Eastern Cape, South Africa: an assessment. Oryx 41:205–214.

Hayward MW, Hayward GJ, Druce DJ, Kerley GI. 2009. Do fences constrain predator movements on an evolutionary scale? Home range, food intake and movement patterns of large predators reintroduced to Addo Elephant National Park, South Africa. Biodiversity and Conservation 18:887–904.

Hayward MW, Kerley GI. 2005. Prey preferences of the lion (*Panthera leo*). Journal of Zoology 267:309–322.

Hunter LT, Pretorius K, Carlisle LC, Rickelton M, Walker C, Slotow R, Skinner JD. 2007. Restoring lions *Panthera leo* to northern KwaZulu-Natal, South Africa: short-term biological and technical success but equivocal long-term conservation. Oryx 41:196.

Hunter LTB, White P, Henschel P, Frank L, Burton C, Loveridge A, Balme G, Breitenmoser C, Breitenmoser U. 2013. Walking with lions: why there is no role for captive-origin lions *Panthera leo* in species restoration. Oryx 47:19–24.

Lehmann MB, Funston PJ, Owen CR, Slotow R. 2008. Home range utilisation and territorial behaviour of lions (*Panthera leo*) on Karongwe Game Reserve, South Africa. PloS One 3:e3998.

Lindsey P, Alexander R, Balme G, Midlane N, Craig J. 2012. Possible Relationships between the South African Captive-Bred Lion Hunting Industry and the Hunting and Conservation of Lions Elsewhere in Africa. South African Journal of Wildlife Research 42:11–22.

Maas M, Keet DF, Rutten VPMG, Heesterbeek JA, Nielen M. 2012. Assessing the impact of feline immunodeficiency virus and bovine tuberculosis co-infection in African lions. Proceedings of the Royal Society of London B: Biological Sciences 279:4206–4214.

Maciejewski K, Kerley GI. 2014. Understanding tourists' preference for mammal species in private protected areas: is there a case for extralimital species for ecotourism? PloS One 9:e88192.

Marker L, Dickman A, Schumann M. 2005. Using livestock guarding dogs as a conflict resolution strategy on Namibian farms. Carnivore Damage Prevention News 8:28–32.

Maruping-Mzileni NT. 2015. Drivers and consequences of bovine tuberculosis in lions (*Panthera leo*) of the Kruger National Park, South Africa. D.Tech. Thesis. Tshwane University of Technology, Pretoria, South Africa.

McManus JS, Dickman AJ, Gaynor D, Smuts BH, Macdonald DW. 2015. Dead or alive? Comparing costs and benefits of lethal and non-lethal human–wildlife conflict mitigation on livestock farms. Oryx 49:687–695.

Miller SM et al. 2013. Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and guidelines. South African Journal of Wildlife Research 43:138–154.

Miller SM, Funston PJ. 2014. Rapid growth rates of lion (*Panthera leo*) populations in small, fenced reserves in South Africa: a management dilemma. South African Journal of Wildlife Research 44:43–55.

Miller SM, Harper CK, Bloomer P, Hofmeyr J, Funston PJ. 2015. Fenced and fragmented: conservation value of managed metapopulations. PloS One 10:e0144605.

Mills MGL, Wolff P, Le Riche EAN, Meyer IJ. 1978. Some population characteristics of the lion *Panthera leo* in the Kalahari Gemsbok National Park. Koedoe 21:163–171.

Monadjem A. 1998. The Mammals of Swaziland. Conservation Trust of Swaziland and Big Games Parks, Mbabane, Swaziland.

Nowell K, Jackson P. 1996. Wild Cats. Status Survey and Conservation Action Plan. IUCN SSC Cat Specialist Group, Gland, Switzerland and Cambridge, UK.

Packer C et al. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16:635–641.

Power RJ. 2002. Prey selection of lions *Panthera leo* in a small, enclosed reserve. Koedoe 45:67–75.

Power RJ. 2003. Evaluating how many lions a small reserve can sustain. South African Journal of Wildlife Research 33:3–11.

Power RJ. 2014. The Distribution and Status of Mammals in the North West Province. Department of Economic Development, Environment, Conservation & Tourism, North West Provincial Government, Mahikeng, South Africa.

Riggio J et al. 2013. The size of savannah Africa: a lion's (*Panthera leo*) view. Biodiversity and Conservation 22:17–35.

SANBI. 2012. Information collated by the Scientific Authority in response to the CITES Periodic Review process for Lion. South African National Biodiversity Institute, Pretoria, South Africa.

Skead CJ. 2007. Historical Incidence of the Larger Land Mammals in the broader Eastern Cape, Second Edition (Boshoff AF, Kerley GIH, Lloyd PH, editors). Port Elizabeth: Centre for African Conservation Ecology, Nelson Mandela Metropolitan University.

Slotow R, Hunter LTB. 2009. Reintroduction decisions taken at the incorrect social scale devalue their conservation contribution: the African lion in South Africa. Pages 41–73 in Hayward MW, Somers MJ, editors. Reintroduction of Top-Order Predators. Wiley-Blackwell, Oxford, UK.

Smuts GL. 1976. Population characteristics and recent history of lions in two parts of the Kruger National Park. Koedoe 19:153–164.

Trinkel M et al. 2008. Translocating lions into an inbred lion population in the Hluhluwe–iMfolozi Park, South Africa. Animal Conservation 11:138–143.

Trinkel M, Cooper D, Packer C, Slotow R. 2011. Inbreeding depression increases susceptibility to bovine tuberculosis in lions: an experimental test using an inbred-outbred contrast through translocation. Journal of Wildlife Diseases 47:494–500.

Trinkel M, Funston P, Hofmeyr M, Hofmeyr D, Dell S, Packer C, Slotow R. 2010. Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13:374–382.

West PM, Packer C. 2013. *Panthera leo*. Pages 149–159 in Kingdon J, Hoffmann M, editors. The Mammals of Africa, Volume V: Carnivores, Pangolins, Equids and Rhinoceroses. Bloomsbury Publishing, London, UK.

Whiting MJ, Williams VL, Hibbitts TJ. 2011. Animals traded for traditional medicine at the Faraday market in South Africa: species diversity and conservation implications. Journal of Zoology 284:84–96.

Williams VL, Newton DJ, Loveridge AJ, Macdonald DW. 2015a. Bones of contention: an assessment of the South African trade in African Lion *Panthera leo* bones and other body parts. TRAFFIC, Cambridge, UK & WildCRU, Oxford, UK.

Williams VL, Loveridge AJ, Newton DJ, Macdonald DW. 2015b. Traditional medicines: Tiger-bone trade could threaten lions. Nature 523:290–290.

Wittemyer G, Elsen P, Bean WT, Burton ACO, Brashares JS. 2008. Accelerated human population growth at protected area edges. Science 321:123–126.

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Details of the methods used to make this assessment can be found in *Mammal Red List 2016: Introduction and Methodology*.

the conservation value of the captive lions lay in the fact that for every captive lion hunted there is one less wild lion hunted. So the captive lion industry absorb a lot of the hunting pressure that the wild lions would have endured. So in short 80 % of the lion trophy fees are spent on taking care of my breeding projects and taking care of my lions. The other 20 % is spent on running my game preserve and taking care of other wild animals and paying very good salaries to my workers. All my workers live in brick houses with free electricity. They have hot and cold running water in their houses with showers and flush toilets. They earn much higher wages than the neigboring ranches and are far above the minimum wages. All of this is only possible if we can hunt lions. Without lion hunting we will get rid of all wild animals and go back to cattle ranching.

Question 9 c. Other funding activities is that we belong to SAPA and as a SAPA accredited ranch we have to donate R10 000 for every lion hunted to SAPA's conservation fund.
SAPA will be more qualified to expand on some of the conservation projects but what I know is that SAPA has released two prides of captive bred lions on different game reserves and on both these projects the captive bred lions have adapted to catching their own game without any problems or any lions dying. In fact both projects were so sucessful that the females started breeding and raised their own babies in the wild. With both these projects they proved the GREEN movements wrong who said captive lions cannot be released in the wild and therefore have no conservation value. Other projects that SAPA was involved in was that they bought and supplied collars for a lion research project on wild lions in the Zambesi valley in Zimbabwe. Another project was that SAPA bought a vehicle for anti poaching patrols in Tanzania. So all these projects that SAPA does. have a huge conservation benefit to wild lion populations. Through our donations (R10 000 per lion) we contibute with every lion hunted to SAPA's conservation fund. We also have a game auction once a year where every member have to donate a hunt or animals. etc. to be auctioned off for the benefit of the conservation fund. In addition we pay a membership fee to SAPA and that money also end up in the conservation fund.

That is about as much information as I have.
You are welcome to contact SAPA's CEO Mr Deon Swart on 083-616-8104 for more detailed information.
SAPA has done a lot for lion conservation and all with money that came from hunting captive bred lions.
SAPA has got a very strict list of norms and standards that each memebr must abide by.
So far only 8 ranches has been accredited by SAPA. That is how high the standard is.

Question 9B - In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Trophy fee of $ (Please insert value) was paid to hunt Mr. Rogers lion. Of this, the funds were used as follows: (SEE ATTACHED)

- Government - a portion is paid to local government for the licences/permits for every lion hunted. This money is intended for use in the further conservation of the species and upliftment of rural communities.
- Landowner - 80 % of the funds received by the landowner are spent directly on lion conservation, through the upkeep and growth of lion breeding projects and taking care of lions in the landowners breeding programme. The remainder is spent on running costs and upkeep of the total reserve, including conservation of other wild animals inhabiting it and employment creation/payment of salaries to people employed from the local community.

Question 9C - Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

The landowner is a member of SAPA (South African Predator Association) and as a SAPA accredited ranch, they agree to donate R10 000 for every lion hunted to SAPA's conservation fund. Some of the conservation efforts initiated by SAPA:

- Released two prides of captive bred lions on different game reserves and on both these projects the captive bred lions have adapted to catching their own game without any problems or any lions dying. In fact both projects were so sucessful that the females started breeding and raised their own babies in the wild. With both these projects they proved skeptics wrong who said captive lions cannot be released in the wild and therefore have no conservation value.
- Bought and supplied collars for a lion research project on wild lions in the Zambesi valley.
- SAPA bought a vehicle for anti poaching patrols in Tanzania.

Members also have a game auction once a year where every member have to donate a hunt or animals, etc. to be auctioned off for the benefit of the conservation fund. In addition a membership fee is paid to SAPA and that money also end up in the conservation fund.

So in short, all these projects that SAPA does, have a huge conservation benefit to wild lion populations and lion conservation.
For further information, please contact SAPA's CEO Mr Deon Swart on 083-616-8104 for more detailed information.
SAPA has got a very strict list of norms and standards that each member must abide by.
So far only 8 ranches has been accredited by SAPA. Below is a summary of major achievements since 2012:

SAPA Achievements (Since 2012)

- Establishment of South Africa Predator Association.
- SAPA Norms and Standards for Hunting Ranch Lions.
- Assessment of lion hunting destinations for accreditation.
- Accreditation of a number of hunting destinations.
- Establishment and implementation of the marking system "tags" for hunting of ranch lions.
- Establishment of DNA profiling databases for ranch lions - 1000 Lion samples in Databases.

- Establishing "traceability" of Ranch lions.
- Liaison with National Department of Environmental Affairs on the trade of lion and lion derivatives.
- Liaison with Provincial Biodiversity Management Authorities through Wildlife forum meetings.
- Comments and inputs in Provincial and National legislation managing the lion industry.
- Draft Norms and Standards: Lion rearing and management. – In process with DAFF.
- Involvement in Wild lion conservation project in Zimbabwe.
- Bursary to University of North West: Lion Research.

Nelson, Emma <emma_nelson@fws.gov>

Re: Inquiry from Rep. Yoho's office

1 message

Cogliano, Mary <mary_cogliano@fws.gov> Thu, Aug 1, 2019 at 11:14 AM
To: "Jones, Lisa" <lisa_m_jones@fws.gov>
Cc: Jorge Villavicencio <jorge_villavicencio@fws.gov>
Bcc: emma_nelson@fws.gov

Hi Lisa,

The application is pending and currently under review.

Thank you,

Mary

On Wed, Jul 31, 2019 at 5:24 PM Jones, Lisa <lisa_m_jones@fws.gov> wrote:

> Hi Mary and George,
>
> Would you mind looking into the status of this application for me?
>
> Everett "Arky" Rogers' lion from South Africa that he hunted in March of 2018. Permit # **15606D**
>
> Many thanks!
>
> Lisa
>
> ---
> Lisa Hummon-Jones
> Congressional and Legislative Affairs Specialist
> U.S. Fish and Wildlife Service
> 703-358-2536 (o)
> 202-365-7255 (c)

--
Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803
Phone: (703) 358-1991

Nelson, Emma <emma_nelson@fws.gov>

Fwd: [EXTERNAL] FW: USFW Info Request for Arky Rogers Lion Import

1 message

Jones, Lisa <lisa_m_jones@fws.gov> Wed, Nov 13, 2019 at 4:56 PM
To: Pamela Scruggs <pamela_scruggs@fws.gov>, Mary Cogliano <mary_cogliano@fws.gov>, Emma Nelson <emma_nelson@fws.gov>

fyi.....Mary, let's discuss this when you get back.

Lisa

Lisa Hummon-Jones
Congressional and Legislative Affairs Specialist
U.S. Fish and Wildlife Service
703-358-2536 (o)
202-365-7255 (c)

---------- Forwarded message ---------
From: **Norfleet, Jessica** <Jessica.Norfleet@mail.house.gov>
Date: Wed, Nov 13, 2019 at 4:47 PM
Subject: [EXTERNAL] FW: USFW Info Request for Arky Rogers Lion Import
To: Jones, Lisa <lisa_m_jones@fws.gov>
Cc: Calhoun, Larry <Larry.Calhoun@mail.house.gov>

Please see the info below, I hope this helps by providing more info. Also, did the USFW members make it back from Africa yet and did they get a good response from the government over there on the requests?

Jessica P. Norfleet

District Director

Congressman Ted S. Yoho

Florida's 3rd Congressional District

5000 NW 27th Court, Suite A.

Gainesville, FL. 32606

352-505-0838 (P)

352-505-3511 (F)

YOHO.HOUSE.GOV

==========

The information in this message is the property of the United States Congress, confidential, and intended only for the use of the addressee. If the reader of this message is not the intended recipient, you are hereby notified that any unauthorized

dissemination, distribution, or copying of this communication is strictly prohibited. Violators are subject to all penalties as allowed by Federal law. If you have received this communication in error, please immediately reply to the sender.

==========

From: Safari Specialty Importers <info@safarispecialtyimporters.com>
Sent: Monday, November 11, 2019 2:28 PM
To: [redacted]
Subject: Fwd: USFW Info Request for Arky Rogers Lion Import

Howdy Jessica,

Please see below and attached information from Hans de Klerk, Mr. Roger's outfitter for his lion hunt. I believe that this, along with the information already provided to USFW should be more than enough for them to make a decision. Ultimately it comes down to the fact that the lion is already dead, what benefit is derived by not allowing it into the US.

Let me know if you need anything else.

Best,

Wyatt Fetner

Wyatt Fetner
758 Sheldon Road
Wallkill, NY 12589
1.845.943.5943

www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

---------- Forwarded message ---------
From: **Hans De Klerk** <dksafaris@gmail.com>
Date: Thu, Nov 7, 2019 at 3:32 PM
Subject: Re: USFW Info Request for Arky Rogers Lion Import
To: Safari Specialty Importers <info@safarispecialtyimporters.com>
Cc: Hans De Klerk <dksafaris@gmail.com>

Hello Mr Fetner

I received your e-mail and have forwarded it to my office.

I am currently hunting mule deer and elk in Colorado and we do not have good telephone signal in the mountains.

Also very busy every day hunting leaving at 5 every morning and returning late at night.

I will try and answer most of your questions to the best of my ability but because I am not in my office I do not have all the info with me and my secretary back in South Africa will also not know the answers.

I know you are trying to get as much information as possible to show to your government that lion hunting does have a conservation value but some of the questions is not applicable to us.

For example we have zero poaching in our area and no communities or villages on my ranches so those questions does not apply to us.

We employ the same people in the off season as the hunting season but there is no place to write about it.

We just use the staff in different positions.

Other questions that I feel need to be in your form is not there.

For example you need to ask how does lion hunting benefit wildlife.

What percentage of money generated by lion hunting goes back into conservation.

The lions we hunt are all lions that have been released on the ranch.

The money generated by the lion hunts goes straight back into breeding, feeding, veterinary expenses, fences, maintenance of my other lions.

Activities that provide a conservation benefit not just to the lions but to other species is the following: pumping and distibuting fresh water over many miles of desert terrain, feeding animals in times of drought to get them through the worst, maintaining fences, buying in new genetics, selling off or hunting excess animals, manage populations, reinvesting money made from lion hunting into buying more land for conservation. And there is much more examples.

Regarding question 10 : I do not have the numbers with me but I can tell you the trend.

We used to have 80 % of our clients from USA and at the peak before USA stopped importation of lion trophies we hunted about 60 lions every year.

After USA closed the importation the number of lions hunted dropped to 4 then slowly picked up to the present number of about 10 a year as we switched our marketing to other countries. Now we are only having about 50 % USA clients. Our income dropped by more than 50 % since USA stopped importation of lions.

I am a SAPA member and my ranch is one of only 8 accredited ranches.

I will ask the office to send you the proof of membership.

If you need proof that captive bred lions does have a conservation value you need to get in contact with SAPA.

SAPA has accomplished twice now with two seperate projects what the greenies said was impossible.

The greenies said captive lions does not have a conservation value as they cannot be released into the wild as they will not survive.

Well SAPA has proven them wrong. On two seperate projects captive bred lions were released into the wild where they not only survived but they thrived and had babies and multiplied.

Any other questions feel free to ask.

My USA cell number is 214-707-0740 if you need to call.

This number is only active while I am in USA and that will be till November 25, 2019 and again next year in January and February.

Attached below is the form filled out to the best of my ability.

I do not have a printer and scanner out here in the mountains of Colorado so cannot sign the form.

Also attached is a map of where our ranch is. We are about 35 km west of Bray and 240 km northwest of Vryburg.

The coordinates are as follow :

S 25’31”02,74

E023’26”56,94

Sincerely

Hans de Klerk

DE KLERK SAFARIS

> On 05 Nov 2019, at 5:38 PM, Safari Specialty Importers <info@safarispecialtyimporters.com> wrote:
>
> Howdy Hans,
>
> My name is Wyatt Fetner with Safari Specialty Importers. Mr. Rogers has engaged us to manage the import process for his lion from RSA. It is a pleasure to meet you.
>
> We are in the process of getting USFW all the necessary information they need to make a decision on issuing the Import Permit for Mr. Rogers lion. I need you to complete the attached Enhancement Finding Form to the best of your ability, and also provide any and all documentation you have regarding your SAPA membership and its efforts in lion conservation. Please let me know if you have any questions. We are trying to get this information together to present to USFW next Monday, so please complete as soon as possible.
>
> Thanks,
>
> Wyatt Fetner

Wyatt Fetner

758 Sheldon Road

Wallkill, NY 12589

1.845.943.5943

www.safarispecialtyimporters.com

info@safarispecialtyimporters.com

<Op Enhancement Qs.docx>

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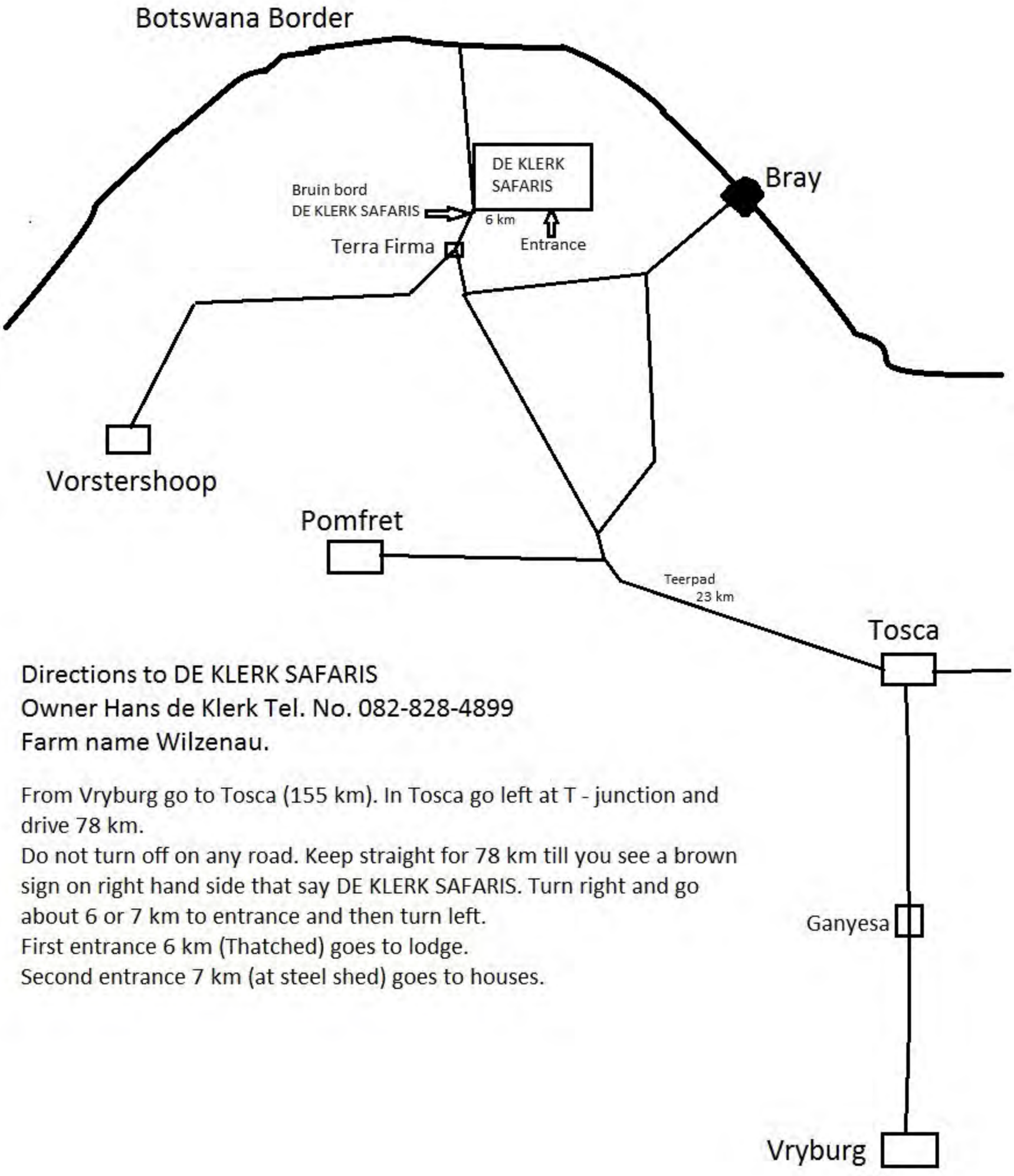
2 attachments

Map DE KLERK SAFARIS Wilzenau.jpg
163K

Op Enhancement Qs.pdf
129K



Directions to DE KLERK SAFARIS
Owner Hans de Klerk Tel. No. 082-828-4899
Farm name Wilzenau.

From Vryburg go to Tosca (155 km). In Tosca go left at T - junction and drive 78 km.
Do not turn off on any road. Keep straight for 78 km till you see a brown sign on right hand side that say DE KLERK SAFARIS. Turn right and go about 6 or 7 km to entrance and then turn left.
First entrance 6 km (Thatched) goes to lodge.
Second entrance 7 km (at steel shed) goes to houses.

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. OPERATOR INFORMATION

Name of Area Operator: DE KLERK SAFARIS

Years in business: 1990 till present (29 years)

Name of Company conducting hunt: DE KLERK SAFARIS

City where hunt will take place: No city - closest town is Vryburg 240 km away

Country where hunt will take place: South Africa

2. CONCESSION

Name of Concession: 8 private ranches owned by DE KLERK SAFARIS

Area in Km^2: 296,9785 (29 697 Hectares or 73 385 acres)

Land tenure: Privately owned (private ranch)

Government Lease Community Private Ranch Private Conservancy

Length of Concession Agreement: Not applicable

Can it be renewed? Yes No

Length of Renewal, if applicable:

Estimated total amount received in trophy fees last year, if applicable:

Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:

Please provide the Concession location and nearest City: 35 km west of Bray Northwest province

Please attach a map or maps with the boundaries marked and showing the nearest City

If the Concession borders a National Park, please provide Park name:

Description of general and distinctive habitat features and any water features:

Kalahari desert - open flat savannah with acacia thorn trees and bushes scattered. Soil is Kalahari red sand. Average rainfall is about 400 mm (16 inches)

3. COMMUNITIES IN THE CONCESSION

Are there any communities living in the Concession? Yes No No

If so, estimated number of people or villages in the Concession? Not applicable

Are there communities bordering this Concession? Yes No No

If so, estimated number of people or Villages around the Concession?

4. **Relevant Game Populations in the Concession:**[1]

Species name	Relative Abundance			Estimated Population	3-Year trend			How is it monitored?
	Dense	Avg.	Sparse		Up	Down	Stable	
Elephant								
Lion		x		10 to 20			x	We know how many we release
Leopard			x	3 to 6			x	tracks
Prey species	x			3000 to 5 000			x	Helicopter count

5. **Local Community Participation**

Total employment number: 26

Please identify the number and type of all employees:

Employee Type	Total number of this type	Number of this type who are local/ from nearby Communities
Professional Hunters	3	3
Trackers	4	4
Anti-Poaching Scouts/ Rangers		
Other Anti-Poaching		
Cooks/Housekeepers	6	6
Community Coordinators		
Managers	3	3
Biologists		
Others: ___Skinners / drivers, camp, fence workers, etc_____	10	10

6. Number of staff employed in the off-season: 26

a. Please identify the number and type of staff that are engaged when the season is not open:

Employee Type	Total number of this type	Number of locals / from nearby Communities	When employed?
Anti-Poaching staff	0	0	

[1] The new Fish and Wildlife Services (FWS) Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

MANAGERS	3	3	All year
MAINTENANCE			
ROAD OPENING /CONSTRUCTION			
COMMUNITY RELATIONS PERSONNEL			
OTHERS:	23	23	All year

7. **ANTI-POACHING EFFORTS:**[2]

Number of Anti-Poaching staff: None needed as there is no poaching

Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both? N/A

Hunting season: Off-season: Both seasons:

Months during which Anti-Poaching Patrols are conducted:

Number of Anti-Poaching Patrols per month:

Description of Anti-Poaching equipment, vehicles, etc.:

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?

7. **ANTI-POACHING EFFORTS *[CONTINUATION]***

Do you offer rewards to poaching informants leading to arrest? Yes No

Do you offer rewards to poaching informants upon conviction? Yes No

Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS				
EQUIPMENT				
VEHICLES				
PETROL				
REWARDS PAID				
OTHER: _____				
OTHER: _____				
TOTALS				

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

What currency are the expenditures given in? .....

8. **ANTI-POACHING RESULTS:**

CATEGORY	2016	2017	2018	REMARKS
POACHING INCIDENTS DISCOVERED				
ELEPHANT CARCASSES OBSERVED				
LION CARCASSES OBSERVED				
LEOPARD CARCASSES OBSERVED				
IVORY POACHERS ARRESTED				
MEAT POACHERS ARRESTED				
OTHER POACHERS ARRESTED				
POACHERS CONVICTED				
SNARES/GIN TRAPS COLLECTED				
FIREARMS CONFISCATED				
VEHICLES CONFISCATED				
BICYCLES CONFISCATED				
BOATS/NETS CONFISCATED				
TUSKS RECOVERED				
OTHER: _____				

9. **COMMUNITY INVESTMENT:**[3]

Does the Company contribute money or goods/services to local communities?

x Yes No

If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?

Voluntary contributions to schools and local villages.

Does the Company provide game meat to nearby communities? x Yes No

If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

$5 000 throughout the year. Voluntary whenever we have too much meat available

If the Company performs problem animal activities for surrounding communities (e.g.: patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.

Not applicable

Please describe any consolation payments made to local residents damaged by game species

N/A

What currency are the expenditures reported in?

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2016	CONSOLATION PAID 2017	CONSOLATION PAID 2018
ELEPHANT				
LION				
LEOPARD				
OTHER				

Please describe any community projects paid for by the Company:

Soccer team sponsorship - $5 000

What currency are the expenditures reported in? US Dollar

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)				
EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

HEALTH (E.G.: CLINICS, OFFICES)
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)
COMMUNITY SCOUT SALARIES
OTHER COMMUNITY ANTI-POACHING

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
LOCAL GOVERNMENT ACTIVITIES				
WATER INFRASTRUCTURE IMPROVEMENTS				
SPORTS TEAMS FUNDED				
CONSTRUCTION MATERIALS DONATED				
OTHER: _____				
OTHER: _____				
TOTALS				

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT	HUNTING LION	HUNTING LEOPARD	HUNTING ALL SPECIES
NUMBER OF U.S. CLIENTS	2016:	2016:	2016:	2016:
	2017:	2017:	2017:	2017:
	2018:	2018:	2018:	2018:
PERCENTAGE OF U.S. CLIENTS	2016:	2016:	2016:	2016:
	2017:	2017:	2017:	2017:
	2018:	2018:	2018:	2018:
TROPHY FEES PAID BY U.S. CLIENTS	2016:	2016:	2016:	2016:
	2017:	2017:	2017:	2017:
	2018:	2018:	2018:	2018:

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: .....

12. **OTHER INFORMATION**: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g., aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.

13. I declare that the foregoing is true and correct:

TELEPHONE: +27-82-828-4899

EMAIL: dksafaris@gmail.com

SIGNATURE	
J.C. de Klerk	
PRINT - FULL NAME	**TITLE**

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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SHANE MAHONEY
RENEE SNIDER

November 7, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD NOV 14 2018

RCVD NOV 14 2018

RE: Import Application of Zambia Lion and Leopard Trophies for Theodore Fowler

Dear Chief Cogliano:

Enclosed please find the permit applications to import a lion and leopard trophy from Zambia for Theodore Fowler. Also attached to the permit applications is an operator enhancement questionnaire provided by Lumimba Mwanya- MVU Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion and leopard trophy imports.

Unfortunately, this application was misplaced in our office by a trainee months ago so we would appreciate any courtesy in expediting the processing.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Theodore Fowler Lion Permit Application, 100.00 Check and Notice of Representation
- Theodore Fowler Leopard Permit Application, 100.00 Check and Notice of Representation
- Lumimba Mwanya- MVU Safaris Operator Enhancement Questionnaire

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6) [redacted]

Name: Theodore M. Fowler, Jr.

Date: 07/18/18

RCVD NOV 14 2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Federal Fish and Wildlife Permit Application Form

Lion

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name: Fowler	1.b. First name: Theodore	1.c. Middle name or initial: Meredith	1.d. Suffix: Jr
2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b)(6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)				
(b)(6) [redacted]				
1.b. City: Raleigh	1.c. State: North Carolina	1.d. Zip code/Postal code: 27614	1.e. County/Province: Wake	1.f. Country: USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))
2.	Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is [redacted] statement herein may subject me to the criminal penalties
(b)(6) [redacted]	7/18/18 Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      LION

   b. Sex (if known).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

      N/A

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

      Zambia, Mwanya GMA

   b. Date wildlife was hunted: 29 June 2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

      MVU Safaris Zambia Limited

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      MVU Safaris 6980 Katanga Road Lusaka, Zambia

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name: MVU Safaris Zambia Limited
   Business Name: MVU Safaris
   Address: 6980 Katanga Road Lusaka
   City: Lusaka
   State/Province: Zambia
   Country, Postal Code: 10101

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   Please see attached documentation.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understar[redacted]not be re-exported.

    Applicant's signature[redacted]ate: 7/18/18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

#7 page 1 of 3

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

0000568

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 08/6/18 .....

DETAILS OF PERMIT HOLDER

Il name: Theodora Fowler ..... NRC/Passport No (b)(6) [redacted]

Tel/Mobile No (b)(6) [redacted] ..... E-mail address.....

Postal Address [redacted] ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... (b)(6) [redacted] ..... 2. ..... (b)(6) [redacted] .....

Calibre(s) 1.: ..... [redacted] ..... 2. ..... [redacted] .....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lumimba ..... Game Management Area,

..... Muanya ..... Hunting block for ..... 14 ..... days from 11/6/18

to..... 24/6/18 ..... (Dates inclusive)

Amount Paid..... $150 .....

GRZ Receipt No..... 0043533 .....

.....
Official Stamp

- 8 JUN 2018

.....
Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

#7 Page 2 of 3

NPW FORM 12

S/No. 0000155

ORIGINAL

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 14 of 2015)
(Licences and Fees) Regulations, 2007
(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: SAEED ABDUL KARIM NRC/Passport No. 168806/71/1
Residential Address: 219/M NAKATINDI RD LIVINGSTONE
Name of Safari Company on behalf of which the Professional Hunter is submitting this return: MVU SAFARIS

DETAILS OF CLIENT
Name of client: THEODORE FOWLER NRC/Passport No: [redacted]
Tel/Mobile No. Nationality: AMERICAN
Postal Address U.S.A
Type of Licence: CLASSICAL Residential Address
Date of Issue: 08-6-18 Licence No: 0000369
Name of Hunting Block where hunting was conducted: LUMIMBA / MWAMYA Place of Issue: CHILANGA
Hunting period From: 11-6-18 To: 01-7-18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
25-6-18	HIPPO	M	ONE	NIL	[illegible]	✓		LH 0000731
26-6-18	Bushbuck	M	ONE	NIL	[illegible]	✓		LH 0000429
28-6-18	ELAND	M	ONE	NIL	[illegible]	✓		LH 0000761
29-6-18	LION	M	ONE	NIL	[illegible]	✓		LH 0000423
1-7-18	CROCODILE	M	ONE	NIL	[illegible]	✓		

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Hippo		28"		
Bushbuck			15.2	
Eland		28"		
Lion				26
Crocodile	13 FEET			

Certification by -

(a) Client
I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter
I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date.....
Date.....
Date.....

Signature of Client.....
Signature of Professional Hunter.....
Name of Wildlife Police Officer EMMANUEL BANDA
Employment No. of W.P.O. 2400069
Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

#7 page 3 of 3

NPW FORM 12

0000154

S/No.....

ORIGINAL

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: SAEED ABDUL KARIM NRC/Passport No. 168806/71/1

Residential Address: 219/M NAKATINDI ROAD . LIVINGSTONE

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Mvu Safaris

DETAILS OF CLIENT

Name of client: Theodore Fowler NRC/Passport No: (b)(6)

Tel/Mobile No..... Nationality: American USA

Postal Address..... Residential Address: (b)(6)

Type of Licence: Classical Licence No.:

Date of Issue: 8-6-18 Place of Issue: CHILANGA

Name of Hunting Block where hunting was conducted: LUMIMBA

Hunting period From: 11-6-18 To: 24-6-18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
HIPPO 11/6	HIPPO	M	ONE	NIL		✓	✗	0000432
PUKU 17/6	PUKU	M	ONE	NIL		✓		237
18/6/18	LEOPARD	M	ONE	NIL		✓		0000424
19/6/18	WARTHOG	M	ONE	NIL		✓		0000154
20/6/18	BUFFALO	M	ONE	NIL		✓		0000426

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
HIPPO		27'		
PUKU		18'		
LEOPARD				15.3'
WARTHOG				13'
BUFFALO			37'	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and [redacted] above is the full amount paid by the client for the hunt.

Date.....

Date.....

Date.....

Signature of Client.....

Signature of Professional Hunter.....

Name of Wildlife Police Officer.....

Employment No. of W.P.O. 210008[illegible]

Signature of W.P.O. Emmanuel Banda

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Conservation Force
Operator Enhancement Questionnaire

v 5/8/18

#9
(7 pages)

1. Name of area operator: **_LUMIMBA MWANYA-MVU SAFARIS**_____

   a. Years in business: ___**EIGHT YEARS YEARS**_____

   b. Name of company conducting hunt: ___**MVU SAFARIS**_____

   2. Name of concession: **_LUMIMBA MWANYA GMA**__ Size in km^2: __**1603 KM2_(LUPANDE)**___

   a. Land tenure: __ Government lease _x_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: ____**SEVEN YEARS**_____ Can it be renewed? _**X**_ Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **_YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   _____

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: _____**NEAREST TOWN IS MFUWE**____

   e. If the concession borders a national park, please provide the park name: __**SOUTH LUANGWA NATIONAL PARK**_____

   f. Description of general and distinctive habitat features and any water features: _**HABITAT INCLUDES SAVANNA GRASSLANDS,MOPANE WOODLANDS AND LAGOONS THE LUANGWA RIVER FLOWS THROUGH THE GMA**_____

3. Are there any communities living in the concession? _**X**_ Yes __ No

   a. If so, estimated number of people or villages in the concession? _**ABOUT 200 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? _**X**_ Yes __ No

   a. If so, estimated number of people or villages around the concession? _**THE POPULATION IS SPARSE AROUND THE GMA**_____

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**ABUNDANT**	**600 AND ABOVE**	**UPWARD**	**PATROL DATA AND OBSERVATIONS**
Lion	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Leopard	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Prey species	**ABUNDANT PREY BASE**	**ABUNDANT**	**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**

6. Total employment number: **__20 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS**_____

a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	TWELVE	TWELVE
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **_FIVE (5)**_____

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	12	12	THROUGH OUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	20	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

a. Number of anti-poaching staff: _____**TWELVE**_____

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? __**BOTH**_____

c. Months during which anti-poaching patrols are conducted: __**THROUGH OUT THE YEAR**_____

d. Number of anti-poaching patrols per month: ___**WE DO THREE PATROLS**_____

e. Description of anti-poaching equipment, vehicles, etc.: _____**TWO 4X4 LANDCRUISERS, SATELLITE PHONES AND FIREARMS**_____

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? ___**WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**_____

g. Do you offer rewards to poaching informants leading to arrest? **X**__ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _**X**_ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ____**ZAMBIAN KWACHA**_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	140 800	140,800	140,800	AMOUNT FOR 12 SCOUTS PER ANNUM

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Equipment	50,000	43,000	30,800	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000			USED TO BUY A LANCRUISER IN THE FIRST YEAR DONATED TO DNPWS
Petrol	57,600	55,100	56,200	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	10,000	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _____				
Other: _____				
TOTALS	**660,400**	**246,900**	**237 800**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	201	115	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	8	2	3	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	81	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	5	0	1	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	558	402	289	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	27	19	7	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY

				ARE REMOVED FROM THE ELEPHANT
Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __**WE PAY 170,000 KWACHA AS COMMUNITY OBLIGATION AND 90,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES**_____

c. Does the company provide game meat to nearby communities? X__ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **the meat contribution program: 50% OF EADIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**_____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. __**OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**_____

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? ____**ZAMBIAN KWACHA**_____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	13,000	33,700	41,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _**ZAMBIAN KWACHA**__

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		90,000	135,000	Most of the schools in this Area are in a deplorable state.MVU safaris has embarked on a program to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS		**90,000**	**135,000**	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	2(40%)	8 (60%)	10(62%)
-- hunting lion	0	2	2
-- hunting elephant	0	2	2
-- hunting leopard	3	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: ___**50%**_____

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____MUHAMMAD SAEED ESSA_____

Name: _____MUHAMMAD SAEED ESSA_____ Title: _____DIRECTOR____

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

July 22, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD JUL 29 2019

RE: PRT No. 15967D/ Lion Trophy, Zambia, Theodore Fowler

Dear Ms. Vargas,

This supplement is in response to your email May 22 and July 19, 2019 in regards to Theodore Fowler's application for a Lion Trophy Import from Zambia.

In regards to your May 22 email, here is the information you requested:

1. The sex of the Lion in Male (This can be confirmed on the *Zambian Record of Game and/ or protected animals killed form* no. 0000155)
2. Mr. Fowler has 2 hunting licenses for this trip. One license (No.0000568) valid for 11/6/18 to 24/6/18 and license (No. 0000569) valid from 6/25/18 to 01/7/2018. Please see attached copies of licenses for reference.

In regards to your July 19th email, here is the information you requested:

3. The Lion in question was harvested on June 29, 2018. The attached Zambian Hunting Permit No. 0000569 mentioned above is valid from June 25 to July 1, 2018 – so the lion would be covered under this hunting permit.

PRT No. 15967D

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl: Zambian Hunting Permits No. 0000568 and 0000569

cc: Ted Fowler (via email) /
Hardcopy sent to DMA via FED-EX 7/22/2019

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Serial No. 555555

NPW FORM 5B

S/No.: .....

0000568

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 08/6/18 .....

DETAILS OF PERMIT HOLDER

ll name:..... Theodora fowler ..... NRC/Passport No: (b)(6) [redacted]

Tel/Mobile No:..... E-mail address.....

Postal Address..... (b)(6) [redacted] ..... Residential Address: ..... USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 905 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 416 ..... 2. ..... 7mm ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No.....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lemimba ..... Game Management Area,

..... Muanya ..... Hunting block for ..... 14 ..... days from..... 11/6/18 .....

to..... 24/6/18 ..... (Dates inclusive)

Amount Paid..... $150 ..... GRZ Receipt No..... 0043533 .....

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
- 8 JUN 2018
LICENSING
PRIVATE BAG 1 [illegible] GA, ZAMBIA.

..... Official Stamp

..... Chairperson of the Committee

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Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0000569

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 08/6/18 .....

DETAILS OF PERMIT HOLDER

Full name:..... Theodora Fowler .....

NRC/Passport No:..... (b)(6) .....

Tel/Mobile No.:.....

E-mail address.....

Postal Address (b)(6) .....

Residential Address: ..... USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 905 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 416 ..... 2. ..... 7mm ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No.....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lumimba .....

..... Musanya .....Game Management Area, 25/6/18

to..... 01/7/18 ..... (Dates inclusive) .....Hunting block for ..... 7 .....days from..... 01/7/18

Amount Paid..... $150 .....

GRZ Receipt No..... 0043533 .....

.....
Official Stamp

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
-8 JUN 2018
PRIVATE BAG 1 CHILANGA, ZAMBIA.

.....
Chairperson of the Committee

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Vargas, Darcy <darcy_vargas@fws.gov>

Application # 15967D / Lion import from Zambia

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 2:54 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Mr. Jackson,

Ref: 15967D; Import of Mr. Theodore Meredith Fowler's lion trophy from Mwanya GMA, Lusaka Zambia, on June 29, 2018.

The referenced application has been reviewed. However, additional information is being requested. Therefore, please reply to the following:

1. Please provide the sex of the lion that was taken (male/female). Question 4.b. of the application was not responded to.

2. Please clarify the different hunt dates listed on 2 different licenses enclosed in the application package for Mr. Fowler. One license, # 0000568, authorizes Mr. Fowler to hunt within Mwanya GMA, from November 6, 2018, through June 24, 2018. Those dates are prior to the date the lion was taken. However, license # 0000155, documents the hunt of 1 male lion, taken on June 29, 2019, by Mr. Fowler's through professional hunter, Saeed Abdul Karim. The date of June 29, 2018, correlates with the hunt date listed in the application question # 6.b.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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Vargas, Darcy <darcy_vargas@fws.gov>

Application # 15967D / Lion import from Zambia

Vargas, Darcy <darcy_vargas@fws.gov> Fri, Jul 19, 2019 at 9:55 AM
To: "John J. Jackson, III" <cf@conservationforce.org>, permits@conservationforce.org

Good morning,

Ref: 15967D

I just called and spoke with your receptionist whom very kindly provided a new email address for permitting related questions.

I was calling in reference to Mr. Theodore Fowler's application # 15967D. On May 22, 2019, additional information was requested to be provided within 45 calendar days. The 45 calendar days are past due. However, we would like to offer a 1 time courtesy extension of time to submit a complete application. In that regard, I would also like to try and clarify the missing documentation.

The referenced application package contains a *Record of Game and/or Protected Animals Killed or Wounded* that lists the hunt of one male lion on June 29, 2018. However, the provided *Permit to Hunt in a Game Management Area* does not authorize the June 29, 2018, hunt. The Zambian permit enclosed in the referenced application package only approves the hunt of a lion taken between June 11, 2018, and June 24, 2018, which is prior to Mr. Fowler's hunt date of June 29, 2019. Therefore, in order to have a complete application package, you must provide a copy of Mr. Fowler's Zambian permit authorizing the hunt of a male lion from Mwanya GMA on June 29, 2019.

Due to the fact that the 45 days to submit a complete application has been past due since June 6, 2019, please provide the requested documentation within 1 calendar week, by July 26, 2019. If the requested permit is not received **by July 26, 2019**, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
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On Wed, May 22, 2019 at 2:54 PM Vargas, Darcy <darcy_vargas@fws.gov> wrote:

> Dear Mr. Jackson,
>
> Ref: 15967D; Import of Mr. Theodore Meredith Fowler's lion trophy from Mwanya GMA, Lusaka Zambia, on June 29, 2018.

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 15967D / Lion import from Zambia

Rachel Brechbuehler <permits@conservationforce.org> Mon, Jul 22, 2019 at 2:36 PM
Reply-To: "John J. Jackson, III" <cf@conservationforce.org>
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Ms. Vargas,

Hello. I wanted to follow up with you on your email from 7/19/2019 in reference to Mr. Theodore Fowler's application No. 15967D to import a lion trophy from Zambia.

Attached is our response and copies of both Zambian Hunting permits. I will also mail a hardcopy via FED-EX to you.

Please feel free to contact me if you have any questions or concerns.

Best, Rachel

Rachel Brechbuehler
Conservation Force
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
w. www.conservationforce.org

> On July 19, 2019 at 8:55 AM "Vargas, Darcy" <darcy_vargas@fws.gov> wrote:
>
> Good morning,
>
> Ref: 15967D
>
> I just called and spoke with your receptionist whom very kindly provided a new email address for permitting related questions.
>
> I was calling in reference to Mr. Theodore Fowler's application # 15967D. On May 22, 2019, additional information was requested to be provided within 45 calendar days. The 45 calendar days are past due. However, we would like to offer a 1 time courtesy extension of time to submit a complete application. In that regard, I would also like to try and clarify the missing documentation.
>
> The referenced application package contains a *Record of Game and/or Protected Animals Killed or Wounded* that lists the hunt of one male lion on June 29, 2018. However, the provided *Permit to Hunt in a Game Management Area* does not authorize the June 29, 2018, hunt. The Zambian permit enclosed in the referenced application package only approves the hunt of a lion taken between June 11, 2018, and June 24, 2018, which is prior to Mr. Fowler's hunt date of June 29, 2019. Therefore, in order to have a complete application package, you must provide a copy of Mr. Fowler's Zambian permit authorizing the hunt of a male lion from Mwanya GMA on June 29, 2019.
>
> Due to the fact that the 45 days to submit a complete application has been past due since June 6, 2019, please provide the requested documentation within 1 calendar week, by July 26, 2019. If the requested permit is not received **by July 26, 2019**, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.
>
> Respectfully,
>
> Darcy Vargas

Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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On Wed, May 22, 2019 at 2:54 PM Vargas, Darcy < darcy_vargas@fws.gov> wrote:

> Dear Mr. Jackson,
>
> Ref: 15967D; Import of Mr. Theodore Meredith Fowler's lion trophy from Mwanya GMA, Lusaka Zambia, on June 29, 2018.
>
> The referenced application has been reviewed. However, additional information is being requested. Therefore, please reply to the following:
>
> 1. Please provide the sex of the lion that was taken (male/female). Question 4.b. of the application was not responded to.
>
> 2. Please clarify the different hunt dates listed on 2 different licenses enclosed in the application package for Mr. Fowler. One license, # 0000568, authorizes Mr. Fowler to hunt within Mwanya GMA, from November 6, 2018, throug h June 24, 2018. Those dates are prior to the date the lion was taken. However, license # 0000155, documents the hunt of 1 male lion, taken on June 29, 2019, by Mr. Fowler's through professional hunter, Saeed Abdul Karim. The date of June 29, 2018, correlates with the hunt date listed in the application question # 6.b.
> [Quoted text hidden]

Fowler PRT No.15967D.pdf
1662K

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A FORCE FOR WILDLIFE CONSERVATION

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July 22, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: PRT No. 15967D/ Lion Trophy, Zambia, Theodore Fowler

Dear Ms. Vargas,

This supplement is in response to your email May 22 and July 19, 2019 in regards to Theodore Fowler's application for a Lion Trophy Import from Zambia.

In regards to your May 22 email, here is the information you requested:

1. The sex of the Lion in Male (This can be confirmed on the *Zambian Record of Game and/ or protected animals killed form* no. 0000155)
2. Mr. Fowler has 2 hunting licenses for this trip. One license (No.0000568) valid for 11/6/18 to 24/6/18 and license (No. 0000569) valid from 6/25/18 to 01/7/2018. Please see attached copies of licenses for reference.

In regards to your July 19th email, here is the information you requested:

3. The Lion in question was harvested on June 29, 2018. The attached Zambian Hunting Permit No. 0000569 mentioned above is valid from June 25 to July 1, 2018 – so the lion would be covered under this hunting permit.

PRT No. 15967D

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl: Zambian Hunting Permits No. 0000568 and 0000569

cc: Ted Fowler (via email) /
Hardcopy sent to DMA via FED-EX 7/22/2019

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Serial No. 555555

NPW FORM 5B

S/No.: .....

0000568

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 08/6/18 .....

DETAILS OF PERMIT HOLDER

ll name:..... Theodora Fowler ..... NRC/Passport No:..... (b)(6) .....

Tel/Mobile No (b)(6) ..... E-mail address.....

Postal Addres ..... Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 905 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 416 ..... 2. ..... 7mm ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No.....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lumimba ..... Game Management Area,

..... Mwanya ..... Hunting block for ..... 14 ..... days from..... 11/6/18

to..... 24/6/18 ..... (Dates inclusive)

Amount Paid..... $150 .....

GRZ Receipt No..... 0043533

.....
Official Stamp

- 8 JUN 2018

.....
Chairperson of the Committee

Note: *Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book*

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0000569

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 08/6/18

DETAILS OF PERMIT HOLDER

Full name:..... Theodora fowler .....

Tel/Mobile N... (b)(6) ..... NRC/Passport No... (b)(6)

Postal Addre... ..... E-mail address.....

..... Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 905 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 416 ..... 2. ..... 7mm ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No.....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lemimba .....

..... Game Management Area, 25/6/18

..... Mwanya .....

to..... 01/7/18 ..... (Dates inclusive) ..... Hunting block for ..... 7 .....days from..... 01/7/18

Amount Paid..... $150 .....

GRZ Receipt No..... 0043533 .....

.....
Official Stamp

.....
Chairperson of the Committee

Note: *Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book*

BISON CONNECT

Vargas, Darcy <darcy_vargas@fws.gov>

Permit Application for Mr. Fowler

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Sep 5, 2019 at 12:49 PM
To: "Jones, Lisa" <lisa_m_jones@fws.gov>
Cc: Anna Barry <anna_barry@fws.gov>, "Cogliano, Mary" <mary_cogliano@fws.gov>

Hi Lisa,

Yes, the status of application # 15967D, has changed. The initial application review has been completed and the application is only awaiting supervisor review/approval.

Regards,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

On Thu, Sep 5, 2019 at 12:44 PM Jones, Lisa <lisa_m_jones@fws.gov> wrote:

> Hi Darcy,
>
> We received a follow-up inquiry from Senator Burr's office. Has there been any change in the status of this application?
>
> Many thanks!
>
> Lisa
>
> ---
> Lisa Hummon-Jones
> Congressional and Legislative Affairs Specialist
> U.S. Fish and Wildlife Service
> 703-358-2536 (o)
> 202-365-7255 (c)

On Wed, Jul 17, 2019 at 1:01 PM Vargas, Darcy <darcy_vargas@fws.gov> wrote:

> Hi Lisa and Angela,
>
> Attached is a copy of the email I sent requesting additional information in regards to Mr. Fowler's lion trophy import application # 15967D. I also attached a copy of part of the application indicating why my email was sent to Conservation Force instead of Mr. Fowler.
>
> Please let me know if you have any questions.
>
> Regards,
>
> Darcy Vargas

Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Wed, Jul 17, 2019 at 11:57 AM
Subject: Permit Application for Mr. Fowler
To: Vargas, Darcy <darcy_vargas@fws.gov>

Darcy,

Could you send Angela Gustavson and Lisa M. Jones a copy of the letter you sent Fowler. Let them know that the actual due day was July 5th. Please cc me and Mary.

Thanks,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

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---------- Forwarded message ---------
From: **Gustavson, Angela** <angela_gustavson@fws.gov>
Date: Wed, Jul 17, 2019 at 9:50 AM

Subject: Re: Permit Application for Mr. Fowler
To: Mary Cogliano <mary_cogliano@fws.gov>, Anna Barry <anna_barry@fws.gov>
Cc: Lisa Jones <lisa_m_jones@fws.gov>

I'm looping in Anna as well because I think you may be Acting in another position, Mary.

Anna - We had an inquiry from Sen. Burr's office about Mr. Fowler's permit application. Lisa had let them know that we had requested additional information from Mr. Fowler.

Sen. Burr's office would like to know what additional information we requested.

Thanks,

Angela

Angela Gustavson
Deputy Chief
Division of Congressional and Legislative Affairs
U.S. Fish and Wildlife Service
Office: 703-358-2253
Mobile: 202-909-5105
angela_gustavson@fws.gov

On Wed, Jul 17, 2019 at 9:47 AM Gustavson, Angela <angela_gustavson@fws.gov> wrote:

> Hi Mary,
>
> We had an inquiry from Sen. Burr's office about Mr. Fowler's permit application. Lisa had let them know that we had requested additional information from Mr. Fowler.
>
> Sen. Burr's office would like to know what additional information we requested.
>
> Thanks,
>
> Angela
>
> Angela Gustavson
> Deputy Chief
> Division of Congressional and Legislative Affairs
> U.S. Fish and Wildlife Service
> Office: 703-358-2253
> Mobile: 202-909-5105
> angela_gustavson@fws.gov

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] FW: Import application / TZ lion / Withdrawn

Allison Morris <amorris@investorsmanagement.com> Tue, Nov 5, 2019 at 2:43 PM
To: "darcy_vargas@fws.gov" <darcy_vargas@fws.gov>

Good afternoon Ms. Vargas,

On behalf of Ted Fowler, I'm emailing to inquire about the status of his permit application number 15967D for a Zambian lion.

Any info you can provide on the progress of the application would be most appreciated.

Thank you,

Allison Morris

Assistant to Ted Fowler

919-881-4545 office

919-414-6802 cell

Begin forwarded message:

From: Ted Fowler (b)(6)
Date: August 23, 2019 at 4:08:07 PM EDT
To: "Butzler, Julia" <julia_butzler@fws.gov>
Subject: Re: Import application / TZ lion / Withdrawn

Thank you! I was on cruise shop in English Channel and dining room was very noisy!

Thanks for your assistance! Have a nice weekend ,

Ted Fowler

Sent from my iPhone

On Aug 23, 2019, at 3:47 PM, Butzler, Julia <julia_butzler@fws.gov> wrote:

Mr. Fowler,

Thank you for taking the time to speak with me this afternoon. As discussed, I have withdrawn your application to import a lion intended to be taken in 2018 from Tanzania.

The application for a lion taken from Zambia is currently being reviewed by Darcy Vargas (Darcy_Vargas@fws.gov, (703) 358-2399. The reference number for this application is 15967D

Sincerely,

--

Julia Butzler, Biologist

Branch of Permits

Division of Management Authority

U.S. Fish and Wildlife Service

(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] FW: Import application / TZ lion / Withdrawn

Vargas, Darcy <darcy_vargas@fws.gov> Tue, Nov 5, 2019 at 3:45 PM
To: "Cogliano, Mary" <mary_cogliano@fws.gov>

Hi Mary,

I am sharing the forwarded status inquire because the file is still pending your review/approval and in September we had received a congressional.

Thanks,
Darcy

--
Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] FW: Import application / TZ lion / Withdrawn

Vargas, Darcy <darcy_vargas@fws.gov> Tue, Nov 5, 2019 at 3:43 PM
To: Allison Morris (b)(6)

Dear Ms. Morris,

Ref: 15967D

Your referenced lion trophy import application is still currently under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

[Quoted text hidden]

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Amy Brisendine Date: April 7, 2020

Telephone Number: 703-358-2005

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 15967d, Theodore Meredith Fowler, has requested a permit to import a trophy of one lion that he lawfully hunted in Zambia. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zambia on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zambia.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zambia. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** — **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** — _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** — _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** — _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** — _____

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.05 19:34:41 -04'00'

Signature: _____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____ Date: _____

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
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May 5, 2020

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.05 19:31:51 -04'00'

Memorandum

From: Mary Cogliano

To: Permit File PRT-15967D

Enhancement Finding

Applicant: Theodore M. Fowler (PRT-15967D)

Summary

Theodore M. Fowler submitted an application to import one male African lion (*Panthera leo melanochaita*), which he hunted on June 29, 2018, from Mwanya, Zambia, for the purpose of enhancing the propagation and survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion out of Zambia requires the prior issuance of a CITES export permit from the CITES Management Authority of Zambia; and import into the United States requires the prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service, therefore, may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and information received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken June 29, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

U.S. Governance of the Lion:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion (79 Fed. Reg. 64472.). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service

published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (80 Fed. Reg. 79999). The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application demonstrating that the activity meets the requirements for issuance under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in future findings for import of sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Fowler's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Mwanya- Lumimba Game Management Area (GMA), in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of

trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Fowler's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we review a number of factors. Some of the factors we considered in making this finding include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country.

Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives for local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. In this finding, we examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the proposed import of this trophy in accordance with the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how Mr. Fowler's participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range country and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the

sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for our finding:

In February 2020, the Service received an updated "Enhancement and Non-detriment Finding for African lion Sport Hunting in Zambia" from Zambia's Department of National Parks and Wildlife (DNPW). This updated finding notes, "since the re-introduction of trophy hunting for lion in 2016, the DNPW is implementing an adaptive management strategy that limits the off-take of lions. To support this approach, it has experimented in implementing a robust age-based monitoring programme that will become binding for the 2020 hunting season." Prior to this February 2020, update, in February 2016, the Service sent a letter to Zambia's Wildlife Authority with questions about the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether the management addresses the three main threats that were identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. In the letter, the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, aids the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to this letter, Zambia's DNPW (DNPW 2016), provided documentation, dated May 5, 2017, describing Zambia's lion population and management plans.

Since 2016, the Service has met with officials from Zambia multiple times to receive updated information and clarify questions the Service has had on the status of and management of lions in Zambia with respect to imports of sport-hunted lion trophies. For example, more recently, Service representatives met with Zambian officials in February, 2020, at the annual Safari Club International Convention in Reno, Nevada; November, 2019, at the 17th African Wildlife Consultative Forum in Zimbabwe; and November 2018, at the 16th African Wildlife Consultative Forum in Uganda.

The documentation the Service received from DNPW in February, 2020, and May, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, information received from interested parties, and Mr. Fowler's application are the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS), which was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly

to its semi-autonomy, had a low funding capacity, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with its law enforcement capabilities due to inadequate resources.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Zambia's vision as stated in the Strategy is to have a secure, viable, and well-managed wild population of lions that will support conservation of biodiversity in harmony with human development. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies and projects that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW 2016). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work-time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. Under DNPW, *the Wildlife Law Enforcement Unit* currently has a staff compliment of 1,525 Wildlife Police Officers covering an estimated 236,376 km^2 of wildlife estates (equivalent to approximately 155 km^2/Wildlife Police Officer) (DNPW 2020, p. 18). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under Zambia's Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were

reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition, Zambia is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including making findings by the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. Zambia has provided to us a copy of its May 5, 2016, non-detriment finding for lions, which it updated in January, 2020. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." The Scientific Authority further explained that its positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa. As of 2020, additional genetic analyses are also being conducted by Zambia Lion Project, including assessments that will help inform DNPW in future efforts to translocate lions among different regions in Zambia in order to re-establish lion populations in historic lion range e.g., West Lunga complex.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). In 2018 the Zambia Carnivore Programme (ZCP 2018) intensively monitored 15 prides and 15 coalitions totaling 173 lions across Northern and Central Kafue in 2018 extending the study area to the remote Kasonso-Busanga GMA. It is believed that the lion population in this ecosystem is stable or possibly increasing (DNPW 2020, p. 11). A report by the Democratic staff of the House Committee on Natural Resources concluded that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al*. 2016). As of 2016, Africa had the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by the year 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al*. 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts. Poverty and the necessity for rural people to obtain some income are the main drivers of bush meat poaching in Zambia. Since 2016, DNPW has continued to work with ZCP and Conservation South Luangwa (CSL) to mitigate snaring by-catch through intensive monitoring of collared wild dog and lion groups through ground, aerial and satellite/ GPS tracking, coupled with data-directed anti-snaring patrols, field-based veterinarians. In the Kafue ecosystem, DNPW worked with ZCP and Panthera through their newly-formed anti-poaching units, as well as, with hunting operators' anti-poaching units, which confirmed no reports of snared carnivores in 2018, with one lion treated for an old snare injury.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting

(Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe had been imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions was a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding, breeding, and commercial use (i.e. walking and petting) of captive-bred lions is banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

NGOs are also a source of supplemental revenue sources. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Although the success of the moratorium cannot be fully assessed, there is some information available that indicates that lion populations are stable or increasing (DNPW 2020, pp. 10-11).

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2020, 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelope system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes are only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2020, 2016). As of 2018, the quota was reduced to 31. The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding

scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW has transformed the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The guidelines were revised in 2019 from those developed in 2016 for lion and in 2018 for lion and leopard and are meant as an instrument to provide technical guidance on the scientific methodologies to be used on lion aging and on some methodologies for lion and leopard hunting and status monitoring. These guidelines also incorporate details pertaining to the monitoring of leopard hunting and status. The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Since the adoption of this practice in 2016, DNPW has introduced a legally binding regulation that will enter into force for the 2020 season (DNPW 2020, p. 42). The Guidelines shall be regularly updated to reflect advances in scientific knowledge in order to guide technically the implementation of the regulations. The new management approach to Lion hunting in Zambia is based on three pillars: i) a conservative, precautionary quota, well below one of the recommended thresholds for sustainability, ii) an age–based harvest limit and strong monitoring of lion offtakes, and iii) significant and direct community benefits. This will ensure that lion hunting in Zambia is

sustainable and does not negatively affect the population. In addition, in the hunting concession agreements signed in 2015, no hunting outfitter has been guaranteed a lion on quota. It is made clear that the quota for any species shall be based on scientific methods including the latest available survey and aging techniques.

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. DNPW also receives funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and permit issuance criteria (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated its desire to maintain the long-term conservation of its lion population with its 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that it has established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy-hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long

enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has identified how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

As described under <u>Current Lion Status in Zambia</u> above, Zambia has taken strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2020, 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An

investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Fowler's hunting and subsequent import of this lion provides an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species is positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion trophy would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Fowler will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Fowler, in managing the lion populations in GMAs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency, they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Fowler.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the

purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion trophy will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Theodore M. Fowler.**

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016 (rev Jan 2020). Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

Permit Number: MA15967D-0
Effective: 05/06/2020 Expires: 05/05/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.05.06 08:54:14 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

(b)(6) **FOWLER JR.**
RALEIGH, NC 27614
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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February 9, 2018

RCVD FEB 12 2018

13

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Application for Import of a Sport-Hunted Lion Trophy

Dear Chief Van Norman:

Enclosed please find one application to import a sport-hunted lion trophy taken in Zambia in 2017. This lion was hunted with Andrew Baldry of Royal Kafue Safaris. Conservation Force provided specific enhancement information regarding Royal Kafue and we respectfully request that this permit be approved upon consideration of the information previously submitted by Conservation Force and the Department of National Parks and Wildlife in Zambia.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a leopard and a threatened-listed lion trophy from Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed (b) (6) [redacted]

Name: Mance Michael Park

Date: 02/06/2018

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD FEB 12 2013 LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name: Park	1.b. First name: Mance	1.c. Middle name or initial: Michael	1.d. Suffix:
2. Date of birth (mm/dd/yyyy): (b) (6)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions): N/A
6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address: (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution: N/A	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes): (b) (6)				
1.b. City: Huntsville	1.c. State: TX	1.d. Zip code/Postal code: 77340	1.e. County/Province: Walker	1.f. Country: USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable): (b) (6)				
2.b. City: Huntsville	2.c. State: TX	2.d. Zip code/Postal code: 77340	2.e. County/Province: Walker	2.f. Country: USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
   Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☐

(b) (6)

art 13 of the Code of Federal Regulations and the other
his application for a permit is complete and accurate to the
nal penalties of 18 U.S.C. 1001.

02/06/2018
Date of signature (mm/dd/yyyy)

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera Leo
      African Lion

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      Lundu, Musalangu, Zambia
      See coordinates on attached permit

   b. Date wildlife was hunted:

      06/26/2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Skin, floating bones, skull, claws, any parts needed for life-size mount

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4142K Chifwema Road
New Kasama, Lusaka, Zambia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to *import a trophy directly from Namibia, you must provide the name and address of the professional hunter* listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Mike Borman
Business Name:	Bangweulu Taxidermy
Address:	4142K Chifwema Road
Address:	
City:	New Kasama, Lusaka, Zambia
State/Province:	
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once *imported into the United States, cannot be re-exported.*

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised that raw ivory, once imported into the United States, cannot be re-expor

Applicant's signatu (b) (6) 02/06/2018

Be aware that ther state government, as well as required by ctivity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that *you will contact me for my credit card information once the application has been processed.*

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John J. Jackson III 504/837-1233
jjj@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

No. 12138

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 12 of 1998)

Form ZAWA 14

The zambia wildlife
(Licences and fees) Regulations, 2003

RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTING LICENCE
(Regulation 6)

DETAILS OF PROFESSIONAL HUNTER

Full Name... ANDLIN BAILEY NRC/Passport No (b) (6) [redacted]

Safari Company on behalf of which the Professional hunter is submitting this return FELSTONE

DETAILS OF CLIENT

Full Name ... MICHAEL PARK NRC/Passport N (b) (6) [redacted]

Postal Address: .....

Non Resident Hunting Licence No. 23680 Date of issue 24/5/17

Name of Hunting block hunting was conducted LUNDU GMA

Hunting period: 17/6/17 to 10/7/17.

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export Yes	Trophy for Export No	Foreing currency value charged to client
20/6	HIPPO M	1	11 24 025 032 441 208		✓		
23/6	LEOPARD M	1	11 15 025 032 49 920		✓		
26/6	LION M	1	11 09 101 032 35 443		✓		
28/6	IMPALA M	1	11 25 441 032 42 428			X	

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Lenth of Horn
HIPPO		55cm	
LEOPARD	SKULL	24 x 16 cm	
LION	SKULL	26 x 26cm	
IMPALA		43cm	

DETAILS OF PAYMENTS MADE

Type of payment	Currency	Amount
Amount of foreign currency paid by the client directly to the Safari Co. for the services rendered by the Co. including overheads & Extras		
Amt of foreign currency paid by the Saf Co. On behalf of the client to the DG for Licences and Hunting rights		
Total Amount Paid		

Verification by (a) Client: I certify that the animals listed on this return were hunted by me during the period stated and the total amount of foreign currency stated and paid by me to the Safari Company is the full amount I was charged

(b) Professional Hunter: I certify that the animals listed on this return were actually hunted by the client in accordance with the terms & conditions of a Non Resident Hunting Licence & that the foreign currency stated above is the full amt. Paid by the client to the Co.

Date:

Signatures: Client

Professional Hunter

Wildlife Police Officer

White copy to the Director General ZAWA
Yellow copy to the Safari Company
Blue copy to be retained by Professional Hunter

Royal Kafue and the Kaindu Natural Resources Trust

By Jim Wojciehowski

The year was 2007. The noise echoing across the water carried a disturbing message.

The mixture of human voices and cattle, coupled with rising smoke from campfires and drying racks, explained the complete lack of wildlife.

PH Andrew Baldry witnessed the spectacle from across the river in the Lunga Luswishi Game Management Area (GMA). He watched a piece of wild Africa rapidly being depleted of its resources with no plan for the future.

The land was owned by the Kaindu community and the title held by a trust – the Kaindu Natural Resources Trust, initially formed by the Danish International Development Agency; but the project floundered when the donors pulled out. The squatters that Baldry observed were not from the community.

Baldry, a fully licensed professional hunter for over 15 years, was very aware of the African adage: "If it pays, it stays." If the local game did not produce a sustained income for the local community, little could be done to stem the poaching and the rapid depletion of the area's wildlife resources.

Andrew made a plan to revive the once flourishing Eden. With the backing of the local community and chief, the concept eventually evolved into Royal Kafue, which would host its first-ever safari in June 2012.

With adequate financial backing, at least for the start-up, Andrew entered into a lease agreement with the community Trust, and instituted anti-poaching patrols by hiring local scouts who would be led by an infamous ex-commercial bush poacher, Green. Who is better suited to outwit a poacher than someone who knows all the tricks of the trade? Green's amazing tracking skills and knowledge of the local habitat also qualified him as head tracker once the safari camp opened for operation.

I first contacted Andrew about hunting together in the Luangwa Valley in 2010. The topic of what would become Royal Kafue came up via e-mail.

Royal Kafue was already in the works, but Andrew felt it would take at least four years for the area to begin to rebound; initially, he didn't want to inject any hunting pressure into the mix. But he was delighted with the rapid returning of game. He knew cats wouldn't return unless ample prey and cover existed.

After allowing the game in the "Kafue Royal" area several years to recover, in 2012 PH Andrew Baldry (L) successfully hunted lion with Jim Wojciehowski (R), generating income from hunting for the Kaindu Natural Resources Trust.

He'd secured a lion and a leopard on quota, plus a limited number of plains game. His assessment of the conditions was totally honest: "Expect game to be difficult to see in June and July. I plan on leaving the majority of the tall grass to give the cats cover."

I sent my money, including a sizable amount to cover trophy fees. It was obvious this start-up was financially taxing with no large financial backers. The many Skype conversations with Andrew gave me a feeling of trust in this man, as well as a drive to be part of this project, myself.

A partnership of need brought together PH Andrew Baldry, my wife Joyce, and me; but the true benefactor of this alliance is the wildlife of Royal Kafue and the community of Kaindu.

By the time we arrived in camp in June 2012, the game had returned in numbers far exceeding the hopes of Andrew and Green. They had prepared the area perfectly by selective burning, interspacing these areas with lush grass cover. Even the once transient buffalo population remained resident for our entire 21-day safari. And with the buffalo came the lion.

We heard lion regularly calling at night, and on the 15th morning in camp, while enjoying coffee in the predawn coolness, we heard them as they moved toward camp. As the light increased, the sound became louder.

We quickly grabbed our rifles and headed down the road on foot to try and intercept the moving chorus. The calls came from a hunting coalition of four mature lions – three males and a female. The group had decimated one of our baits; on their way to water, they were now approaching camp.

The lions hid as we passed on foot. The sound of brush moving behind our group made us turn in time to see two large, heavy-maned mature males and a lioness emerge from cover. The cats deemed us to be insignificant and crossed an open area into the tall grass. A fourth lion revealed himself to be a brute of a male and, with Andrew's challenging grunt, he stopped to evaluate the source of the call.

My frontal shot buckled the cat, and he spun to retreat noisily into cover. We found him dead 100 yards on, in deep cover, after a tense side-by-side follow-up on foot.

Luckily, the chairman and treasurer of the Kaindu Trust, Boniface and Joshua, were in camp and able to join the celebration. Later, they privately thanked me for helping to finance the start-up and contributing to its success. I assured them PH Andrew Baldry alone had earned their gratitude for the implementation of his vision.

Two months after the hunt, Andrew told me of his plans to sink boreholes to provide permanent water for the game. He is looking to attract like-minded investors to further the cause of Royal Kafue for the benefit of the game and the people of Kaindu.

Jim Wojciehowski is a physician assistant living in Alaska. An avid hunter-conservationist, he discovered the magic of Africa on his first trip in 2010. This was his third safari.

2012 SAFARI HUNTING REPORT

KAINDU NATURAL RESOURCES TRUST

Natural Resources Manager Green Kabinda

In the first year of safari operation Kaindu Natural Resources Trust in conjunction with the private sector and ZAWA realizes profits from Zambia's first community owned game ranch.

The results from the first year of operation have been unsurpassed in Zambia's game ranching history.

Not only has the Kaindu Game Ranch utilized over 90% of their allocated quota the trophy quality has only been matched by Zambia's prime hunting concessions. The continual support from ZAWA Research Department has to be commended as to the community scouts and Kaindu representatives who have diligently managed their natural resources.

It was recorded in the 2009 survey that only a handful of wild animals survived on the titled KNRT farm 10145 and that most indigenous species were absent. Illegal fishing and poaching was commonplace in the region.

In 2010 the KNRT entertained a partnership with the private sector in wildlife management and the company Royal Kafue Ltd was formed. The Kaindu community retains a significant shareholding in the development company and receives dividends from private sector investments in tourism.

Royal Kafue loaned the community equipment and the human resources in order to conduct safari hunting at an international standard and have attracted clientele from across the globe. The quality of hunting and the abundant wildlife has resulted in advanced bookings for both 2013 and 2014 with and estimated turnover ZK800,000,000 per annum.

From the first hunt alone the community realized a sum of ZK25,000,000, which was dedicated to social services. In addition safari licenses in excess of ZK15,000,000 were purchased and donated to the community for ceremonial purposes.

These communal lands have now become a valuable asset of which sustainable incomes can now be earned from the protection of the wildlife resource.

Green Kabinda.

KNRT NATURAL RESOURCES MANAGER.

The community game ranch saw 100% utilization of quota on trophy Lion, Buffalo, Sable, Roan, Hartebeest, Sitatunga and a host of other lesser species.

Hunting clients stated that it was without doubt one of Zambia's finest hunting destinations. Subsequent favorable reports have been posted on Internet hunting sites and YouTube. Without exception every client harvested their desired species and all of the animals were of record book class.

Two Sable measured in excess of 45 inches and the Lion was the biggest taken in the region in recent years. Two Roan in excess of 26 inches, and Buffalo of 40 inches were commonplace. The renowned professional hunter Andrew Baldry remarked that the hunting was beyond expectations and has managed to fully book his clients into the game ranch for 2013 and 2014.

The increase in wildlife and especially the more sought after species will warrant an increase in quotas across the board. Some species such a Zebra that were previously in low numbers and can be included on the quota. Species such as Elephant and Hippopotamus are now resident and often seen within the vicinity of camp. Important grasslands and woodland have been preserved from fire and logging. Whilst illegal fishing persists it is envisaged that the community will control and profit from this activity as a separate project for 2013.

Sitatunga, Black Lechwe and Tsessebe were also taken in Bangweulu swamps.

The increase in wildlife has reduced the annual livestock conflicts with Lion.

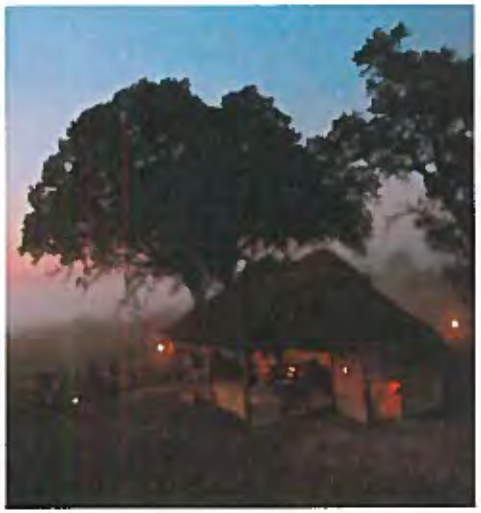
The sale of one successful Lion safari earned sufficient funds to establish the safari camp and infrastructure required for 2012 hunting season. It provided funds that enabled scouts to implement systems that reduced human and wildlife conflicts. Important species such as Lion and other fragile predator populations have increased dramatically under an intensive management program.

A special thank you must be extended to the Natural Resources Scouts who have worked tirelessly in the training in the protective management of their communal lands.

It is the community themselves with the full support of His Royal Highness Chief Kaindu who is to be commended for their desire to realize incomes from both their land sand natural resources.

The cattle killing Lion (see photo bottom right) taken by client first client Jim Wojohowski from Alaska was one of the largest taken in recent years and proves that the community game ranch retains a healthy population of the specie.

It is envisaged that what with the increase in game populations and that research would conclude that the Lion numbers will follow suit. However as a conservation measure the KNRT feels the game ranch can sustain the off take of one mature male if proven problematic to the community.



KNRT

The Kaindu Natural Resources Trust has pursued this project since 2005. The model was initially supported by DANIDA and GRZ as Kaindu was identified as a Kafue community that did not derive benefit from safari hunting.

In 2010 the opportunity to partner the community was tendered and the successful applicants formed the development company Royal Kafue Ltd of which the community are shareholders. Safari hunting is but the first of a number of tourism activities earmarked for our lands. Profits from managed land use, tourism, game ranching and agriculture are already making a favorable impact on our society.

Our thanks to ZAWA and especially Mr. Siamakonda who has worked tirelessly to see this project launched

ROYAL KAFUE

A permanent 4 bed camp of international standards was constructed and equipped for the 2012 safari season. All staff were employed from the Kaindu community and trained in wildlife management and safari procedures by Mr. Green Kabinda and resident professional hunter Mr. Andrew Baldry.

The development company Royal Kafue Ltd loaned vehicles and auxiliary equipment.

Roads were cut and boundaries cleared. Natural resource management was implemented and staffed. Community scouts were equipped and communications installed courtesy of Mushingashi Conservancy.

The camp and the facilities are to be extended for the 2013 season

2012 CLIENT REFERENCES

JIM WOJOHOWSKI

'well done Kaindu and exceeded expectations'

RICHARD MARTIN

'my best African hunt ever. Well done'

MARK YOUNG

'congratulations to Royal Kafue and KNRT'

FAISAL AL ZAID

'never have I seen so many Sable. 10 out of 10'

TIM CARNEY

'fantastic area and people'

BEVAN JONES

'tops for Buffalo and Roan. Great hunt'

Kaindu Natural Resource Trust chairman Mr. Boniface Chisoshi sitting center with the cattle killing Lion taken on the first safari by clients Mr. Jim and Joyce Wojohowski of Alaska. Natural Resources manager Mr. Green Kabinda is standing on the far right with his hand picked team of community scouts and safari staff.

'Where in Africa can one successfully hunt Lion, Roan, Sable, Sitatunga, Buffalo, Defassa Waterbuck and Hartebeest in one concession? The trophy quality was unbelievable! My congratulations and thanks to the people of Kaindu for the most memorable and wonderful safari ' *Jim Wojohowski. 15 July 2012*

KAINDU NATURAL RESOURCES TRUST

PO BOX 83001 Mumbwa, ZAMBIA.

CHAIRMAN. Tel 0979006461

HRH Chief Kaindu. Tel 0978146874

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-76149C

Enhancement Finding
Applicant: Mance Michael Park (PRT-76149C)

Mance Michael Park submitted an application on February 12, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken June 26, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Park's application involving a *P. l. melanochaita* sport-hunted trophy taken in Musalangu GMA, Lundu, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Park's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Park's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Park's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Park's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Park will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Park, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Park.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Mance** (b) (6) **Park.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

6/18/18

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA76149C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

MANCE MICHAEL PARK
(b) (6)
HUNTSVILLE, TX 77340
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season and in accordance with government of Zambia hunting laws and regulations.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

LB

RCVD FEB 12 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA) RCVD FEB 12 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
McGovern	Jason	R.	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tifton	GA	31794	Tift	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Tifton	GA	31793	Tift	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my k[redacted]tand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature (i[redacted] responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 01/28/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      Panthera Leo, Lion
      Panthera Leo, Lioness
   b. Sex (if known).
      1- male
      1- Female

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
      South Africa, Reitzdale Game Reserve, Reitzdale Farm 239,
      Leriesdeel, Northwest, Tosca
   b. Date wildlife was hunted:
      7/28/2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Lion → Life size mount, skin, skull
Lioness → Life size mount, skin, skull

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Republic of South Africa
Moredou Taxidermy, Po Box 323, Schweizer Reneke 2780

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:
Business Name: Logwin Air and Ocean SA (PTY) LTD
Address: 1619 Spartan
Address: Johann Bizkhrat Road
City: Kempton Park
State/Province: Gauteng
Country, Postal Code: South Africa

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b)(6) Date: 01-28-18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Jason McGovern, (b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lace Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

US Fish & Wildlife Service

5) To answer the question on how hunting will enhance or benefit the wild populations of the species. Its been documented that well regulated and monitored hunting is beneficial to the species and not related to population decline. The species is not in trouble because of sport hunting but threatened by habitat loss, loss of prey, and retribution killings during human-wildlife conflicts. If it wasn't for hunting and the money to support the reserves then the habitat would not exist for the species. It also makes the species have value so all the locals do not kill off the species and hunt them to extinction.

Thank you.

Jason McGovern Application

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD APR 26 2018

LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
McAllister	Mark	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			(b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Medford	Oregon	97501	Jackson	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 03-20-18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Mark McAllister
(b) (6) [redacted]
Medford, Oregon 97501

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Mark McAllister
(b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      Panthera leo Melanochaita
   b. Sex (if known).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
      South Africa, Free State Province, Vredefort is the town.

   b. Date wildlife is to be hunted:
      August 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
      Brave Heart Safaris
      PH Joe Viljoen

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Brac Team Safaris
PH Joe Viljoen

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Haven't hunted yet but permit is attached.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Joe Regal
Business Name: Joe Regal Taxidermy
Address: Farm Thelma
City: Odendaalsrus
State/Province: 9480
Country, Postal Code: Free State, South Africa

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

No

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

$27,000 ea No other data

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

No

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b)(6) _____ Date: 3-20-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

OFFICIAL PERMIT

ZASTRON STREET
GRICULTURAL BUILDING
ORD FLOOR
LOEMFONTEIN, 9300
REE STATE
OUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
FAX: +27 (0) 51 400 9523

destea
department of
economic, small business develop
tourism and environmental affair
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

NUMBER	(b) (6)	
AME	Mark Alan MC Alister	
HYSICAL DDRESS	(b) (6)	Box 169
	USA	Vredefort
		9595

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969). AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO;

Hunt following species on the farm Doornpoort, Vredefort.

Species Name	Scientific Name	Total
Lions 900032002299158	Panthera leo	1

PERMIT HOLDER'S SIGNATURE

APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS

EXPIRY DATE	PERMIT NUMBER	DATE ISSUED
30 July 2018	NC.8025/2018	2018/04/13
RETURN PERMIT AFTER EXPIRY		

Department of Economic & Small Business Development Tourism & Environmental Affairs
13 APR 2018
Private bag X 20801
Bloemfontein 9300
Free State Province

Brave Heart Safaris

P.O. Box 169
Vredefort, South Africa
9595

6 November 2018

To Whom It May Concern:

This letter is to confirm that Brave Heart Safaris does encourage local community participation and support of hunting and conservation. Primarily Brave Heart Safaris does employee local community members to work in our lodge and on tracking, skinning, and other efforts. In addition to this, Brave Heart Safaris teams up with ChaZen Private Nature Reserve to educate local community members about conservation efforts and how hunting is a part of preserving species and improving genetics.

ChaZen Private Nature Reserve also employees their own poaching patrol to protect the rhinos and species on the reserve. This patrol is built of local community members. Because of the relationship between ChaZen Private Nature Reserve and Brave Heart Safaris there is effort to donate meat from the hunted species to disadvantaged organizations like orphanages, old age home and shelters for the homeless. We also believe in enriching individuals through sport, music, and related activities.

Efforts with Brave Heart Safaris and ChaZen Private Nature Reserve provide a comprehensive effort to get the local community involved in hunting efforts and conservation programs. We are constantly seeking to expand our involvement in the community and develop new educational opportunities to consistently promote the conservation of species for generations to come. Hunting and conservation do go hand in hand, and we do strive to educate every one of the relationship between the two. We look forward to more years of success with these efforts.
.

Respectfully

Joe Viljoen
Owner

Management Authority, FWHQ <managementauthority@fws.gov>

[EXTERNAL] Fw: Conservation letter - Brave Heart Safaris

1 message

m mcalister (b)(6) Sun, Nov 11, 2018 at 10:57 AM
To: managementauthority@fws.gov

RE: MA87852C-0 Mark McAlister
Please enclose the forwarded email conservation letter and photos to my application PRT MA878
52C-0. The letter and photo documention is from my outfitter who is actively engaged in conservation, protection of many African species and lastly community out reach. Thank you.
Mark McAlister
541-944-1494

Cc; Emma. 703-358-2296

Sent from Yahoo Mail for iPhone

Begin forwarded message:

On Tuesday, November 6, 2018, 12:52 PM, Keri Viljoen <keriviljoen@gmail.com> wrote:

> Mark, I hope you are well. Please find the conservation letter attached, as well as some photos showing our community outreach here at ChaZen.
>
> Thank you. Let me know anything further you may need.
>
> --
> Keri Viljoen
> ChaZen Private Nature Reserve
> Phone/WhatsApp 076-698-9518
> Keriviljoen@gmail.com
> www.chazen.co.za

9 attachments

1073691_1498590137112528_6325516402042670855_o.jpg
97K

25300025_1731403940268210_907046664930348772_o.jpg
71K

10403469_806875592721054_8223474900086356197_n.jpg
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137K

Letter for Conservation Education Confirmation_Brave Heart Safaris.docx
45K

Nelson, Emma <emma_nelson@fws.gov>

[EXTERNAL] Fw: PRT MA 87852C-0 conservation letter - Brave Heart Safaris

2 messages

m mcalister (b)(6) Tue, Nov 13, 2018 at 1:53 PM
To: emma_ne

Good morning Emma,
I'm forwarding to you a conservation letter from the outfitter along with pictures of the community outreach program the outfitter uses. They are very involved in wildlife conservation and preservation of many wildlife species in Africa.
Please enclose this data with my permit PRT. MA 87852C-0.
If you could confirm receipt of this data I would be thankful.
Sincerely,
Mark McAlister
541-944-1494

Sent from Yahoo Mail for iPhone

Begin forwarded message:

On Tuesday, November 6, 2018, 12:52 PM, Keri Viljoen <keriviljoen@gmail.com> wrote:

> Mark, I hope you are well. Please find the conservation letter attached, as well as some photos showing our community outreach here at ChaZen.
>
> Thank you. Let me know anything further you may need.
>
> --
> Keri Viljoen
> ChaZen Private Nature Reserve
> Phone/WhatsApp 076-698-9518
> Keriviljoen@gmail.com
> www.chazen.co.za

9 attachments

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25300025_1731403940268210_907046664930348772_o.jpg
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Letter for Conservation Education Confirmation_Brave Heart Safaris.docx
45K

Nelson, Emma <emma_nelson@fws.gov> Thu, Nov 15, 2018 at 3:18 PM
To (b)(6)

Good afternoon Mark,

Thank you for sending these documents my way. I will add them to your file.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

[Quoted text hidden]

Brave Heart Safaris

P.O. Box 169
Vredefort, South Africa
9595

6 November 2018

To Whom It May Concern:

This letter is to confirm that Brave Heart Safaris does encourage local community participation and support of hunting and conservation. Primarily Brave Heart Safaris does employee local community members to work in our lodge and on tracking, skinning, and other efforts. In addition to this, Brave Heart Safaris teams up with ChaZen Private Nature Reserve to educate local community members about conservation efforts and how hunting is a part of preserving species and improving genetics.

ChaZen Private Nature Reserve also employees their own poaching patrol to protect the rhinos and species on the reserve. This patrol is built of local community members. Because of the relationship between ChaZen Private Nature Reserve and Brave Heart Safaris there is effort to donate meat from the hunted species to disadvantaged organizations like orphanages, old age home and shelters for the homeless. We also believe in enriching individuals through sport, music, and related activities.

Efforts with Brave Heart Safaris and ChaZen Private Nature Reserve provide a comprehensive effort to get the local community involved in hunting efforts and conservation programs. We are constantly seeking to expand our involvement in the community and develop new educational opportunities to consistently promote the conservation of species for generations to come. Hunting and conservation do go hand in hand, and we do strive to educate every one of the relationship between the two. We look forward to more years of success with these efforts.
.

Respectfully

Joe Viljoen
Owner

HERO

SOCIAL SCIENCE

HPN
Glendale Tomatoes
Glendale Tomatoes

ChaZen
CONSERVATION CENTRE
MIKASA

HERO

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

RCVD FEB 28 2018

LB

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
House	Jason	A.S.	

3. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Reno	NV	89523	Washoe	U.S.A.

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other
ormation submitted in this application for a permit is complete and accurate to the
subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

02/08/2018

d or stamped signatures) Date of signature (mm/dd/yyyy)

o next page

IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-32, http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      African Lion (Panthera Leo) Southern

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      Riverside Ranch, Victoria Falls, Zimbabwe

   b. Date wildlife was hunted:

      Oct. 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

Skin (life size), Skull

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

T.C.I
4 Josiah Chinamano Road
Belmont, Bulawayo, Zimbabwe

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Marina Burgess
Business Name: Maple Freight
Address: 4 Josiah Chinamano Rd.
Address:
City: Belmont, Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b)(6) Date: 02/08/2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Houston Texas

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Jason House
(b) (6) [redacted]
Reno NV 89523

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Jason House
(b) (6) [redacted]
(b) (6) [redacted]

Lynette Lilley
(281) 606 2400
llilley@well-usa.com

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/78584C

Enhancement Finding
Applicant: Jason A.S. House (PRT – 78584CC)

Jason A.S. House submitted an application on February 28, 2018, for the importation of one male lion (*Panthera leo melanochaita*) taken from Riverside Ranch, Victoria Falls, Zimbabwe, for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken during October 2016, from this population meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt

any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P.l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinient to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P.l. melanochaita* taken in Zinmbabwe.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)] , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provides a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. House's application involving a *P. l. melanochaita* sport-hunted trophy taken in Zimbabwe, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. House's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zimbabwe's management program for lions addresses the three main threats

that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32 (a)(2), we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter, in this case Mr. House's participation in the hunting program contributes to the overall management of lions within a country.

The management program in Zimbabwe for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on

February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the

primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in Du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lions are transient in

CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (p.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and

subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid

response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented

within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in Du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is legally permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological

perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge *et al*. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five year terms, and how these concessionaires pay a 5 year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015). As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 – 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters account for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport-hunters conduct lion hunts in these areas; if so, the Service is not aware if sport-hunters are exempted by the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at the RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016

report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine that this impact of a sport-hunted lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport hunting market in BVC and SVC from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to locals, which incentivizes them to conserve the African lion. As mentioned in the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. Du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted; ZPWMA (2016) reports the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of the SVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (Du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. U.S. hunter participation in lion hunts, in and of itself, is not enough to make or break the industry. However, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term impact.

Further, the *Strategy and Action Plan* have put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

Therefore, based on the information available to the Service and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Throughout the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based setting for hunting quotas. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector. Further, Zimbabwe appears to be transparent in their management processes, including their quota setting.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (Du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both the BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (Du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable

population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continues to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion will likely reduced the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of this trophy, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the status of lions within Zimbabwe at the time Mr. House conducted his hunt, and the level of management and oversight provided to lions at that time, the Service is able to find that the harvest and import of Mr. House's sport-hunted trophy taken in Zimbabwe during October 2016, meets the purposes of the Act. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe. Although the Service is able to make a finding that the import of this lion meets the enhancement criteria under the Act, the Service will continue to monitor the status and management of the lion in Zimbabwe. Noting that Zimbabwe's last management plan for lion was in 2006, the Service would like to see a current and updated plan that has been established as the national plan and disseminated across the country. The *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (2016), mentions a Management Plan for Hwange National Park; a copy of that and any other developed management plans will be considered in the future. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will

need to be continually updated on further progress of the outputs or targets. Lastly, the Service will also need to review any updates to the quota setting process.

Therefore, with the information available to the Service at the time Mr. House conducted his hunt, and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male lion trophy taken in Zimbabwe, to Mr. Jason A.S. House of Reno, Nevada.**

Anna Barry 6/9/18

Anna Barry, Acting Team Leader
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/2018

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

References

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2015a. Panthera leo. The IUCN Red List of Threatened Species: e.T15951A50658092.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L.T.B., Macdonald, D.W., and Packer, C. 2015b. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. PNAS doi: 10.1073/pnas.1500664112

Bijlsma, R., and Loeschcke, V. (2012), Genetic erosion impedes adaptive responses to stressful environments. Evolutionary Applications, 5: 117–129. doi:10.1111/j.1752-4571.2011.00214.xCAMPFIRE (2015). An Overview.

Björklund, M. Conservation Genetics (2003) 4: 515. https://doi.org/10.1023/A:1024737317695

CITES (2016). Consideration of Proposals for Amendment of Appendices I and II. Seventeenth meeting of the Conference of the Parties. Web: https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-04.pdf

Craigie, I.D., Baillie, J.E.M., Balmford, A., Carbone, C., Collen, B., Green, R.E., and Hutton, J.M. 2010. Large mammal population declines in Africa's protected areas. Biological Conservation 143(9):2221–2228.

Creel, S., M'soka, J., Dröge, E., Rosenblatt, E., Becker, M., Matandiko, W. and T. Simpamba (2016). Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

du Preez, B., Groom, R., Mufute, O., and R. Mandisodza-Chikerema (2016). Zimbabwe Lion Conservation Research Report 2016: Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe.

du Preez, B., Hart, T., Loveridge, A., and D. Macdonald (2015). Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

EcoWeb (2015). Campfire Hunting Income and Distribution.

Elliot, N. B., Valeix, M., Macdonald, D. W. and Loveridge, A. J. (2014), Social relationships affect dispersal timing revealing a delayed infanticide in African lions. Oikos, 123: 1049–1056. doi:10.1111/oik.01266.

Fryxell, J.M., Mosser, A., Sinclair, A.R.E and Packer, C. 2007. Group formation stabilizes predator–prey dynamics. Nature 449, 1041-1043.

Groom, R. J., Funston, P. J., and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx, 48(3): 385-393.

Hayward, M.W., O'Brien, J., and Kerley, G.I.H. 2007. Carrying capacity of large African predators: Predictions and tests. Biological Conservation 139(1):219–229.

Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H., Chardonnet, P., Dickman, A., Edwards, C., Frank, L., Funston, P., Henschel, P., Ikanda, D., Kissui, B., Loveridge, A., Mesochina, P., Midlane, N., White, P., and Whitman-Gelatt, K. 2013. Urgent and Comprehensive Reform of Trophy Hunting of lions is a Better Option than an Endangered Listing; A Science-based Consensus.

IUCN Species Survival Commission (2012). Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN SSC Cat Specialist Group (IUCN SSC) (2006). Conservation Strategy for the Lion *Panthera leo* in Eastern and Southern Africa.

Lindsey, P.A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R.W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J.W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., Van der Westhuizen, H.,Van Vliet, N. and Zisadza-Gandiwa, P. 2013a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. Biological Conservation 160: 80-96.

Lindsey, P., Balme, G.A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013b). The trophy hunting of African lions: scale, current management practices and factors undermining sustainability. PloS One 8(9), e73808.

Lindsey PA, Balme GA, Booth VR, Midlane N (2012). The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. PloS One 7(1): e29332. https://doi.org/10.1371/journal.pone.0029332.

A. J. Loveridge, A. W. Searle, F. Murindagomo, et al. (2007). The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, 134 (4), 548-558.

Macdonald, D. (2016). Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting.

Masterson, C. (2016). Position Statement: The Role of Hunting in Biodiversity Conservation and Livelihood Resilience in Zimbabwe.

Miller, J. et al. (2016). Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201: 160-168.

Muller, L. (2016). Rifa Safari Area – Pro Safaris Africa.

Mutiga, Murithi (2016). Zimbabwe plans to sell elephants and lions to China to fund conservation. The Guardian. Web: https://www.theguardian.com/environment/2016/jan/06/zimbabwe-plans-to-sell-elephants-and-lions-to-china-to-fund-conservation.

Newmark, W. D. (2008). Isolation of African protected areas. Frontiers in Ecology and the Environment, 6: 321–328. doi:10.1890/070003.

Packer, C., Canney, S., Loveridge, A., Garnett, S.T., Zander, K.K., Balme, G., Bauer, H., Begg, C., Begg, K., Bhalla, S., Bonham, R., Brink, H., Burton, C., Caro, T.M., Clegg, B., Dloniak, S., Frank, L., Funston, P., Groom, R., Heath, B., Hill, T., Hunter, L., DeIongh, H.H., Joubert, D., Kissui, B., Knocker, W., Leatham, B., Lindsey, P.A., Maclennan, S.D., MacNutt, T., Nicholls, K., Patterson, B., Plumptre, A., Salerno, J., Slotow, R., Sogbohossou, E., Stratford, K., Winterbach, C., Winterbach, H. and Polasky, S. 2013. Conserving large carnivores: dollars and fence. Ecology Letters 16(5): 635-641. DOI: 10.1111/ele.12091.

Packer, C., Brink, H., Kissui, B. M., Maliti, H., Kushnir, H. and Caro, T. (2011). Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology, 25: 142–153. doi:10.1111/j.1523-1739.2010.01576.x

Packer, C., Whitman, K. Loveridge, A., Jackson III, J., and Funston, P. 2006. Impacts of Trophy Hunting on Lions in Eastern and Southern Africa: Recent Offtake and Future Recommendations. East and Southern African Lion Conservation Workshop Johannesburg, South Africa, 8-13 January 2006.

Packer, C., Pusey, A. E., Rowley, H., Gilbert, D. A., Martenson, J. and O'Brien, S. J. (1991). Case Study of a Population Bottleneck: Lions of the Ngorongoro Crater. Conservation Biology, 5: 219–230. doi:10.1111/j.1523-1739.1991.tb00127.x

Segelbacher, G., Cushman, S., Epperson, B., Fortin, M., Francois, O., Hardy, O., Holderegger, R., Taberlet, P., Waits, L., and S. Manel (2010). Applications of landscape genetics in conservation biology: concepts and challenges. Conservation Genetics (2010) 11:375-385.

Snyman. Lion (*Panthera leo*) social organization in a human affected landscape. 2010.

Traill, L., Brook, B., Frankham, R., Bradshaw, C. (2010). Pragmatic population viability targets in a rapidly changing world, Biological Conservation, Volume 143, Issue 1, 2010, Pages 28-34, ISSN 0006-3207, http://dx.doi.org/10.1016/j.biocon.2009.09.001.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Whitman, K., Starfield, A., Quadling, H. and C. Packer (2004). Sustainable trophy hunting of African lions. 2004. NATURE(428): 175-178.

WildCRU (2015). Mana Pools National Park Predator Survey.

World Wildlife Fund (WWF) (1997). Quota Setting Manual: Wildlife Management Series.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2006). Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks & Wildlife (ZPWMA) and Panthera (2014). Age Restrictions of Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2014). Conservation Status of the African Lion (*Panthera leo*) in Zimbabwe.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2015). Budget Estimates for the Year 2015.

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) (2016). Enhancement and Non-Detriment Findings for Panthera leo in Zimbabwe.

LION ZIMBABWE ESA TROPHY

Permit Number: MA78584C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JASON A.S. HOUSE
(b) (6) [redacted]
RENO, NV 89523
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Zimbabwe.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD FEB 23 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: (b)(6) [redacted]

Name: Steven J Dupuis

Date: 02/21/18

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD FEB 28 2018

LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Dupuis	Steven	Joseph	Jr

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Lafayette	La.	70507	Lafayette	U.S.A.

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Unavailable No ☐

3. Certification: I hereby ce[illegible] ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subch[illegible]*** submitted in this application for a permit is complete and accurate to the best of my knowledge an[illegible] to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature (in blue ink) o[illegible] signatures) Date of signature (mm/dd/yyyy) 02/21/18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P.L. Melanochaita (African Lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: South Luangwa, Zambia in Nyamvu and West Petauke game management area's, Nyimba Being The closest Town Operator and Lease holders Nyamvu and Mopane Safaris
   b. Date wildlife is to be hunted:

      May 7th 2018 Thru May 28th 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      All Parts including Skin, skull, Teeth and Claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      N/A

   b. Date wildlife was hunted:

      N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Bridge Shipping Zambia Limited
Business Name: Villa Park, Plot 177/178 Unit C3
Address:
Address: Luanshya, Road,
City:
State/Province: Lusaka, Zambia.
Country, Postal Code: Zambia, 10101

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 02/21/18

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Same as page 1

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
John Jackson III, Conservation Force, 504-837-1233 jj-No2@att.net or Regina Lennox of Conservation Force Regina.Lennox@conservationfo

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Barry , Anna <anna_barry@fws.gov>

Steven Dupuis PRT #78597C

Steve Dupuis (b) (6) Wed, Apr 11, 2018 at 5:52 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Thank you very much Anna, I understand the process. Please keep me informed of any changes and if I can do anything on my end. Steve

[Quoted text hidden]

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT- 78597C

Enhancement Finding
Applicant: Steven Joseph Dupuis (PRT- 78597C)

Steven Josheph Dupuis submitted an application on February 28, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken May 7, 2018 through May 28, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Dupuis' application involving a *P. l. melanochaita* sport-hunted trophy taken in Zambia's West Petauk GMA, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Dupuis' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Dupuis', participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Dupuis' application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Dupuis' hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Dupuis will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Dupuis, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): <u>The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application</u>:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): <u>Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application</u>:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Dupuis.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Steven (b) (6) Dupuis.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA78597C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coglianese
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
STEVEN JOSEPH DUPUIS JR.
(b) (6) [redacted]
LAFAYETTE, LA 70507
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season and in accordance with government of Zambia hunting laws and regulations.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD AUG 20 2019 LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Dupuis	Steven	Joseph	Jr
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			lisaj@dlchb.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6)

1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
La.	70507	Lafayette	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
same

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Laura Dupuis 08/13/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   D&L CHB
   2015 S. Arlington Heights Rd. Ste. 123
   Arlington Heights IL 60005

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Lisa Jamnik
   847-690-0690
   lisa@dlchb.com

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA785970-0

5. Submit the original permit with this application.

   See attached

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit. N/A

   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal. N/A

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.) N/A

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form. N/A

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: Laura Durgin Date: 08/13/2019

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

LION ZAMBIA ESA TROPHY

Permit Number: MA78597C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coogliano

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

STEVEN JOSEPH DUPUIS JR.
(b)(6) [redacted]
LAFAYETTE, LA 70507
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season and in accordance with government of Zambia hunting laws and regulations.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CUSTOMS POWER OF ATTORNEY
and
Acknowledgement of Terms and Conditions of Service

Copyright 1995, National Customs Brokers and Forwarders Association of America, Inc.
(Revised 07/04)

✓ appropriate box:
- [x] Individual
- [ ] Partnership
- [ ] Corporation
- [ ] Sole Proprietorship
- [ ] Limited Liability Company

SS# (b)(6)

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Steven J Dupuis (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify) doing business as a ✓ INDIVIDUAL (Individual, partnership, corporation, sole proprietorship, or limited liability company) under the laws of the State of ✓ Louisiana residing or having a principal place of business at (b)(6) Lafayette, La 70507, hereby constitutes and appoints ✓ D & L CHB (Grantee's Name), its officers, employees, and/or specifically authorized agents, to act for and on its behalf as a true and lawful agent and attorney of the grantor for and in the name, place and stead of said grantor, from this date, in the United States (the "territory") either in writing, electronically, or by other authorized means, to:

Make, endorse, sign, declare, or swear to any customs entry, withdrawal, declaration, certificate, bill of lading, carnet or any other documents required by law or regulation in connection with the importation, exportation, transportation, of any merchandise in or through the customs territory, shipped or consigned by or to said grantor;

Perform any act or condition which may be required by law or regulation in connection with such merchandise deliverable to said grantor; to receive any merchandise;

Make endorsements on bills of lading conferring authority to transfer title; make entry or collect drawback; and to make, sign, declare, or swear to any statement or certificate required by law or regulation for drawback purposes, regardless of whether such document is intended for filing with U.S. Customs and Border Protection;

Sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits or statements in connection with the entry of merchandise;

Sign and swear to any document and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated by said grantor;

Authorize other Customs Brokers duly licensed within the territory to act as grantor's agent; to receive, endorse and collect checks issued for CBP duty refunds in grantor's name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor;

And generally to transact Customs business, including filing of claims or protests under section 514 of the Tariff Act of 1930, or pursuant to other laws of the territories, in which said grantor is or may be concerned or interested and which may properly be transacted or performed by an agent and attorney;

Giving to said agent and attorney full power and authority to do anything whatever requisite necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents;

This power of attorney to remain full force and effect until revocation in writing is duly given to and received by grantee (if the donor of this power of attorney is a partnership, the said power shall in no case have any force or effect in the United States after the expiration 2 years from the dates of its execution);

Grantor acknowledges receipt of ✓ D & L CHB (Grantee's Name) Terms and Conditions of Service governing all transactions between the Parties.

If the Grantor is a Limited Liability Company, the signatory certifies that he/she has full authority to execute this power on behalf of the Grantor.

IN WITNESS WHEREOF, the said ✓ Steven J Dupuis

caused these presents to be sealed and signed: (Signature) ✓ (b)(6)

(Capacity) ✓ N/A Date: 04/16/18

Witness: (if required) N/A

If you are the importer of record, payment to the broker will not relieve you of liability for CBP charges (duties, taxes or other debts owed CBP) in the event the charges are not paid by the broker. Therefore, if you pay by check, CBP charges may be paid with a separate check payable to "U.S. Customs and Border Protection" which shall be delivered to CBP by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

APPERSON PRINT MANAGEMENT SERVICES • NCBFAA-3 • WHSE. NO. 03540

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Amy Brisendine Date: April 7, 2020

Telephone Number: 703-358-2005

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 78597c, Steven Joseph Dupuis, has requested a permit to import a trophy of one lion that he lawfully hunted in Zambia. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zambia on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zambia.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zambia. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.04 14:38:25 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

Permit Number: MA78597C-1
Effective: 05/04/2020 Expires: 05/03/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.05.04 17:45:40 -04'00'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

(b)(6) **PUIS JR.**
LAFAYETTE, LA 70507
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season and in accordance with government of Zambia hunting laws and regulations.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Re: [EXTERNAL] PRT 78597C

Vargas, Darcy <darcy_vargas@fws.gov>
Mon 6/22/2020 1:01 PM

To: Conroe Taxidermy <info@conroetaxidermy.com>
Cc: (b)(6) [redacted]

Good a. ernoon,

Permit number 78597C was already mailed on May 4, 2020, to the Arlington Heights, IL address requested in the applicaon pack age.

Respecully ,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

From: Conroe Taxidermy <info@conroetaxidermy.com>
Sent: Friday, June 19, 2020 10:31 AM
To: Vargas, Darcy <darcy_vargas@fws.gov>
Cc: steve.aspenclinic@gmail.com <steve.aspenclinic@gmail.com>
Subject: [EXTERNAL] PRT 78597C

Please confirm receipt of this request:

For the renewed LION Import Permit -

Mr. Dupuis would like the updated permit mailed to him directly. Please confirm it has not been mailed out yet – and he will provide a prepaid FedEx envelope. (see email thread below)

Steve Dupuis
5238 Moss Street
Lafaye e, LA 70507

Kindest regards,

Beverly

Re: Permit no. 78597C (Steven DUPUIS)

Vargas, Darcy <darcy_vargas@fws.gov>
Thu 6/25/2020 12:53 PM
To: Brisendine, Amy <amy_brisendine@fws.gov>

Sure. Thanks!

--
Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

From: Brisendine, Amy <amy_brisendine@fws.gov>
Sent: Thursday, June 25, 2020 12:38 PM
To: Vargas, Darcy <darcy_vargas@fws.gov>
Subject: Fw: Permit no. 78597C (Steven DUPUIS)

Hi Darcy,

I did send it via email to his email address, but it came back undeliverable. Can you re-send it to him?

-Amy

From: postmaster@doi.gov <postmaster@doi.gov>
Sent: Monday, May 4, 2020 5:48 PM
To: lisaj@dichb.com <lisaj@dichb.com>
Subject: Undeliverable: Permit no. 78597C (Steven DUPUIS)

ca94.valueserver.com.br rejected your message to the following email addresses:

lisaj@dichb.com (lisaj@dichb.com)
Your message couldn't be delivered and there was no valid enhanced status code being issued by the remote mail system to determine the exact cause, status: '550 No Such User Here'.

ca94.valueserver.com.br gave this error:
No Such User Here

Diagnostic information for administrators:
Generating server: SMTP106.doi.gov
lisaj@dichb.com
ca94.valueserver.com.br
Remote Server returned '550 No Such User Here'
Original message headers:

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Received: from smtp101.smgr.doi.gov (10.10.28.11) by smtp106.doi.gov
 (10.10.28.23) with Microsoft SMTP Server (version=TLS1_2,
 cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.1.1415.2; Mon, 4 May 2020
 21:48:03 +0000
DKIM-Signature: v=1; a=rsa-sha256; d=fws.gov; s=mail; c=relaxed/simple;
        q=dns/txt; i=@fws.gov; t=1588628883; x=1591220883;
        h=From:Sender:Reply-To:Subject:Date:Message-ID:To:Cc:MIME-Version:Content-Type:
        Content-Transfer-Encoding:Content-ID:Content-Description:Resent-Date:Resent-From:
        Resent-Sender:Resent-To:Resent-Cc:Resent-Message-ID:In-Reply-To:References:List-Id:
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        (Client did not present a certificate)
        by smtp101.smgr.doi.gov (Hello) with SMTP id FD.D5.03928.39D80BE5; Mon,  4 May 2020 17:48:03
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Received: from GCC02-DM3-obe.outbound.protection.outlook.com (104.47.65.102)
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 header.d=fws.gov; arc=none
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 2020 21:48:01 +0000
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 21:48:01 +0000
From: "Brisendine, Amy" <amy_brisendine@fws.gov>
To: "lisaj@dichb.com" <lisaj@dichb.com>
```

Subject: Permit no. 78597C (Steven DUPUIS)
Thread-Topic: Permit no. 78597C (Steven DUPUIS)
Thread-Index: AQHWIlyEUPJRiM+kRUGe6RI/H3zLlg==
Disposition-Notification-To: "Brisendine, Amy" <amy_brisendine@fws.gov>
Return-Receipt-To: <amy_brisendine@fws.gov>
Date: Mon, 4 May 2020 21:48:01 +0000
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X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
authentication-results: dichb.com; dkim=none (message not signed)
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x-originating-ip: [68.98.171.126]
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x-ms-office365-filtering-correlation-id: c05b9113-93f6-4f9b-a8e6-08d7f074d159
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x-microsoft-antispam-prvs:
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x-forefront-prvs: 03932714EB
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x-microsoft-antispam-message-info:
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Fw: [EXTERNAL] RE: Lion Permit # 78597C

Vargas, Darcy <darcy_vargas@fws.gov>
Fri 6/26/2020 9:19 AM
To: steve.aspenclinic@gmail.com <steve.aspenclinic@gmail.com>

1 attachments (189 KB)
20-05-04_78597c_final_signed.pdf;

Dear Mr. Dupuis,

It was brought to my a enon tha t you have not received your permit number 87597C. Therefore, please find a copy of your permit a ached to this email. It can be printed for official use (one-me use).

Regards,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

From: Whitley, Stephanie D <stephanie_whitley@fws.gov>
Sent: Thursday, June 25, 2020 11:12 AM
To: Vargas, Darcy <darcy_vargas@fws.gov>
Cc: Steve Dupuis <steve.aspenclinic@gmail.com>; Laura Durgin <Laura.Durgin@dlchb.com>; Lisa Jamnik <LisaJ@dlchb.com>
Subject: Re: [EXTERNAL] RE: Lion Permit

Dear Darcy,

This is regarding Permit No. 78597C. I just spoke with Lisa Jamnik and the bo om line is, they would not have had you send the permit to them via Federal Express. They always use Regular Mail. She has not received the permit. Dl&CHB is no longer handling Mr. Dupis account.

Please send the permit to Mr. Dupuis at his home address listed in SPITS.

Thanks,

RCVD MAR 30 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed (b) (6)

Name: Tubulus John Kerr. III

Date: 19 MARCH 2018.

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD MAR 30 2018

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name: KERR	1.b. First name: Eubulus	1.c Middle name or initial: John	1.d. Suffix: III
2. Date of birth (mm/dd/yyyy)	3. Telephone numb(b) (6)	nate telephone number	4. E-mail address

(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address) (b) (6)				
1.b. City: Shreveport	1.c. State: LA	1.d. Zip code/Postal code: 71106	1.e. County/Province: CADDO	1.f. Country: USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentatio*** 13.11(d))
2.	Certification: I ons contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other d I certify that the information submitted in this application for a permit is complete and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1
	MARCH 19th 2018
	Signature of a d signatures) — Date of signature (mm/dd/yyyy)

(b) (6)

next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
myself - (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ✓ Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTHERA LEO, AFRICAN LION

   b. Sex (if known). MALE.

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   MATETSI Unit 1, Matabeland North, Victoria Falls, Zimbabwe.

   b. Date wildlife is to be hunted: MAY 1 - 21st, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   MARTIN Pieters

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   /

   b. Date wildlife was hunted: /

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
   /

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
   /

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NOT hunted Yet.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Road
City: Belmont
State/Province: Bulawayo, Zimbabwe.
Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   PLEASE SEE ENCLOSED + INFO SUBMITTED BY CONSERVATION FORCE + ZPWMA

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   " "

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   " "

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand [redacted] d States, cannot be re-exported.

    Applicant's signature: [redacted] Date: MARCH 19th, 2018

    Be aware that there [redacted] quirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

MARTIN PIETERS
~ SAFARIS ~

Big game hunting in Zimbabwe.....making a difference to communities

Hunting in Zimbabwe

When you think of Africa, what comes to your mind.....lush plains,flowing rivers,animal migrations.....big cats, safari lodges and kitted game drive vehicles, visions conjured up by numerous wildlife documentaries, dvd's showing exclusive photographic safaris with discerning clientele being pampered by attentive staff.....yes the scenes shown to us make us believe that all is well in Africa. Thats all very well, but realistically, Africa is not all about the above, there are many, many areas that have limited land use options, this is based on rainfall, wildlife numbers, accessibility and terrain. Most of these ' forgotten areas ' are not good enough for the photographic companies, no one wants to invest in the unknown, return on investment would be negative....., so what happens.....

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› Video

Latest Blog posts

› Anti poaching...fighting back

› Sustainable off take benefiting communities

› Big game hunting in Zimbabwe.....making a difference to communities

› Nyaminyami and Martin Pieters Safaris

› Zimbabwe hunting

Enter the safari operator,professional hunter and dedicated wildlife enthusiast.....the client. Countless millions of dollars are poured into these areas annually throughout Africa by true conservationists, people who care about the preservation of our species for future generations. One such area (and there are many) is the Omay, Nyaminyami RDC, operated by Martin Pieters Safaris, www.martinpieterssafaris.com

For many years we have poured hunters dollars into this remote area, educating communities, conducting anti poaching actives, reintroduction and relocation of wildlife , construction of clinics and schools..... 9 years down the road, what do we have.....an area renowned for big game, a community that is happy and a generation that focuses on wildlife conservation and not poaching activities.

In 2014, African conservancies was born and plans for the Ume River Conservancy were laid on the table, further cementing the relationship between dedicated safari operators and the community, allowing them to be directly involved in wildlife based decisions. Plans are currently underway with approval from local government to create a large remote conservancy where sustainable off take of certain species will form the back bone of wildlife conservation. 2 years down the road, we are already seeing the results as populations of several species are increasing whilst poaching activities are decreasing.

There is a lot to be done, but by taking these positive steps, by involving the local residents, by making use of these ' remote and forgotten areas ', areas that are unsuitable for the typical pampered photo safari enthusiast.....we will continue to turn them into areas teeming with wildlife, an area to be proud of.....thank you to our hunters.

Archives

- January 2016
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- September 2015
- July 2015
- June 2015
- May 2015

Next time you are stuck in traffic, have a delayed flight or are shovelling snow off your porch…..close your eyes, dream of Africa, there is no better time to come hunting in Zimbabwe than today.

Our efforts today will be enjoyed by our children of tomorrow.

Share this:

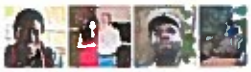
55

By Martin Pieters | November 18th, 2015 | News | 0 Comments

FIND US ON FACEBOOK

Martin Pie
425 likes

Be the first of your frien



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- Nyaminyami and Martin Pieters Safaris
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- Home - Martin Pieters Safaris
- 2015 Trophy Gallery
- Hunting Areas Zimbabwe
- 2014 Trophy Gallery
- Safari Information

CONTACT INFO

Martin and Candy Pieters, P.O BOX 1684, Bulawayo, Zimbabwe
Phone: +263 9 67792
Mobile: +263 778 121 842
Email: Martin Pieters

Website Designed by ZimNinja and SEO by SEO Ninja

Sustainable off take benefiting communities

Sustainable off take

Since 2007 we have been involved in dedicated wildlife conservation through sustainable off take, quota control, anti poaching and community based wildlife education in the Omay campfire concession.

Blog Categories

› News

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Latest Blog posts

› Anti poaching…fighting back

› Sustainable off take benefiting communities

› Big game hunting in Zimbabwe……making a difference to communities

› Nyaminyami and Martin Pieters Safaris

› Zimbabwe hunting

The Omay (NyamiNyami RDC) is a vast (2 million acres) populated communal land which one of the first areas to be given the CAMPFIRE status, whereby local communities benefit from wildlife off take, it is not rocket science that this program works as we continue to see an increase in wildlife numbers in our area. Communities receive direct benefit both financially and through various projects implemented by Martin Pieters safaris such as clinics, schools, vehicles for anti poaching and the employment of scouts. It must be noted that the Nyaminyami RDC is a remote inhospitable concession that has no other land use model due to very erratic and low rainfalls, an abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.

We at Martin Pieters safaris, www.martinpieterssafaris.com employ locals in all our camps as well as a dedicated anti poaching team that works alongside the RDC (council), national parks, the police and the MAPP (Matusadonna anti poaching project), we continue to collect snares, arrest poachers and follow up on convictions and more importantly, educate people on the long term sustainable use of our national heritage. This method has been proven and several past poachers have turned tables and are now our most trusted wildlife officers, using their past notorious skills to help us protect our wildlife.

Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting

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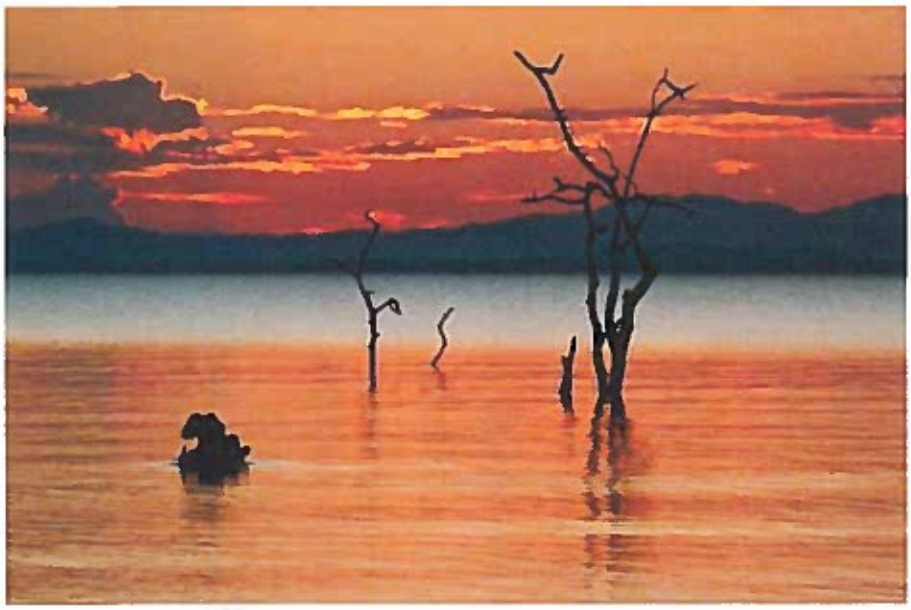
› May 2015

company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti poaching, continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through the destruction of their crops on an annual basis, or the loss of one of their family members.

Our wildlife populations are on the rise, we border the Matusadonna national park, there are no fences to stop animals movements, we are very much needed, even more so now with current rainfall patterns at their lowest, poaching will increase as people find it difficult to grow crops, we will not let the last 10 years of effort to protect our wildlife be a waste, we will not leave these villagers high and dry with no form of income or food.

We thank our hunters for their continued support. It is because of you that our conservation methods are successful.



We spend in excess of $ 40 000 / annum on anti poaching

We have collected over 15 000 wire snares since 2007 saving thousands of animals.

We assist in arrests of subsistence poachers and heavily armed

elephant poachers, we follow up with convictions so that these men and women can be put away and our animals will be safe.

We monitor game movements and patterns and adjust our quotas accordingly so that we continually have an increase for future generations

We have assisted in the construction of clinics, schools and information centers.

We employ over 30 locals in our camps and in the field thus as siting hundreds of locus through indirect benefits.

Last but not else, we pay over $ 200 000 in direct benefits annually to the RDC and the local wards for wildlife off take.

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Anti poaching …fighting back

AFRICAN CONSERVANCIES ANTI-POACHING 2015

AFRICAN CONSERVANCIES

African Conservancies was established in 2014, it's first project was in Nyaminyami Rural District Council in the Omay Communal Land hunting area. A.C comprises Carbon Green International, the relevant Rural District Council and the relevant community in which the conservation plan falls. A trust has been formed that will include these parties as beneficieries.The primary goal of A.C was to locate a suitable area to form, build and manage a sustainable community conservation area. The Omay 1 hunting area between the Ume and Sengwa Rivers was selected as a perfect phase one. The criteria of selection includes; being communal land hunting area, fall within the C.G.I REDD+ project area.

OBJECTIVES OF AFRICAN CONSERVANCIES

The primary objective of A.C was to select an area within the REDD+

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project, (stretching from Binga to Kanyemba in the communal areas) and partner the community and council. The belief in building sustainable conservation areas and in particular enabling communities to truly and directly benefit from from this sustainable utilization is at the core of this project.

The immediate goals with the Ume River Community Conservation Area were to reduce hunting offtake and reduce poaching. The hunting offtake was reduced in 2014 and in 2015. For example, 2014 saw twelve buffalo being hunted from the quota of thirty five. 2015 we will have a buffalo offtake of ten from the possible thirty five. Having done our own numbers on the ground, our offtakes are very conservative and the population increase through relocation due no pressure is clearly visible with far better trophy quality.

Anti poaching began in 2014, the six C.G.I scouts based out of Manyuli camp close to the Gokwe boundary and six scouts based out the Ume hunting camp. We decided at the close of 2014 that the anti poaching was not having enough effect on the structured elephant poaching, so in March 2015 Steve Wentzel and I decided that it needed direction and management. So beginning March, I personally came into the Omay to oversee and manage the anti poaching teams.

I immediately amalgamated the two teams and brought in Mr. Charles Khumalo to head up this new team. Charles is ex Zimbabwean National Army, a brave, dedicated leader who has commanded not only the respect of this unit, but myself and the community at large.

We started in house training incorporating weapons training, tactical house clearances, offensive tracking and building a more intense unit that could cope with a far more aggressive natured outlook to the poaching problems. This immediately began to produce results.

Our focus has been on hardened armed poachers with the theory that the snare and dog meat poachers would be dealt with in the process of eliminating the more "serious" elements.

AREA OF OPERATIONS

Though we in theory are based in the Omay communal land, our operations stretch into Gokwe, around Chizarira and Charisa and Binga. due to our operations being outside of the National Parks we predominantly operate with Police details and R.D.C scouts. Our entire unit has now been accepted as Police reservists and are awaiting their Police force numbers. It has been agreed that our unit

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having been accepted as reservists, will establish a dedicated reaction team within the police force that I shall train and manage.

OPERATIONS

Begining 2014 we funded the basing of James Mcallwain from MAPP out our hunting camp in Chipfudze on the Southern boundary of the Matusadona National Park. The reasoning for this was obviously to maintain the Parks presence on this boundary, which was non existent due to lack of capacity. Secondarily, James was to establish an informant network that would offer up targets for our unit to react to. This was very effective and results were immediate.

With James leaving MAPP in August 2015, the MAPP trustees unfortunately decided to move their operations back into the Park. This led to a huge information breakdown and vacuum.

August 2015 Charles Khumalo was tasked in resurrecting and bettering the information networks as reacting to shots fired is almost a pointless affair. The poaching teams shoot toward last light, fifteen minutes from shots fired, the elephants face is chopped off and they are moving.There is no way to track them fast enough to catch them up at this stage. The needle in haystack affair is almost pointless for arresting poachers. There are over one hundred and fifty square kilometers of bush to patrol, it would require an army to do this. Our first goal was to bring into operations a full time intelligence operative whome we had been grooming for this position.

The informant/intelligence network has had significant effect, we have over one hundred and twenty people on our books. Over ninety percent of our arrests have occurred and been made possible through the capturing or paying for intel. We have put in place "watchers" who monitor targets and wait for opportunity to ensure arrests have hard tangible evidence for prosecution. "Mapani" whom he was second on our priority list and pulled the trigger on the three elephant days after the Sebungwe Action Plan Meeting; was monitored for four months prior to his arrest late October. Literally we actioned the arrest when his "watcher" informed us that he had begun drinking beer with tusks and firearms still being present. After four long months, he eventually made a mistake!

ARRESTS

Below are a list of arrests of hardened elephant poachers, I have omitted all of our lessor arrests of meat poachers.

February 7th 2015

Reaction to shots fired Matusadona southern boundary resulted in a joint op with Parks rangers with our tracker team. Poaching team ambushed and two armed poachers killed. One "John Raymond" being a casualty of this contact was fourth on our priority list. Firearm 303 recovered.

February 12th 2015

Sting operation on the Gokwe boundary resulted in the arrest of three "dealers" supplying arms and ammo to the poaching syndicates. One tusk, thirty rounds 303 and forty five 7.62 intermediate (AK 47) rounds recovered.

March 12th 2015

Contact and exchange of fire in Manyuli, no casualties but a 303 rifle recovered.

April 22nd 2015

Raid carried out on "Magura" syndicate whilst infiltrating. Arrests effected on entire team of four with recovery of 303 rifle.

April 23rd 2015

Intel from "Magura" arrests led to the arrest of "Mark Neberi" who was third on our priority list.

June 23rd 2015

"Jabu" syndicate shot and killed an elephant in the park on the late afternoon of the 22nd June. Sting operation produced 20kg tusks and an arrest. Further information led to the arrest of team members.

July 23rd 2015

Escapees from the February contact arrested and two 303 rifles recovered.

October 22nd 2015

"Mapani" second on our priority list finally cornered with seven tusks one 303 rifle and one 450 watts. His accomplice and partner "Malalanzi" could not be implicated in this arrest, remains monitored and in second place on our priority list. 375 rifle they were using has been "located" and is being monitored for uplift.

FUTURE OPERATIONS

Future operations will continue in the Omay communal land, the hard hitting unit has had a serious effect on poaching syndicates. The informant network has reduced the "safety" factor for the syndicates. We are able to reach right into their homes and they have no secure areas to operate in.

The community outreach via the chiefs seems to be having an effect. Chief Negande has issued an order that anyone assisting poaching syndicates will be banished from the Omay. The subsequent banishing of two of his subjects over the last month has sent a very strong message about how serious he has become!

The upsurge in armed Zambian incursions in the lower Zambezi has us concerned with intel coming in of Zambian teams planning to operate here. The Cyanide is our major concern. Having only picked up poisoned fruit in July with no further cyanide incidents we were fairly relaxed about it. Subsequent to the MAPP arrest of the "Kariba" cyanide team, one of their members who escaped prosecution has been into our area. I am currently running a campaign in the community educating them of this problem. It is finally dawning on people that these elephant poachers will poison water sources that will not only kill elephant, but their livestock and families are at risk to.

As always, funding these operations and supplies of material are a constant battle. Carbon Green and Ume River Conservancy face the brunt of this funding with perpetual short falls. We rely on cell phones for communications, which is erratic at best! Firearms and ammunition have been supplied by me personally, again we are short if all members are in field. The idea of us tackling these teams with catapults and axes sounds ludicrous but is whats happening! So we are perpetually looking for help keeping the ball rolling.

Chris Moore

Ume River Conservancy

13th November 2015

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NYAMINYAMI RURAL DISTRICT COUNCIL

The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE)

The background of the Community Based Natural Resources Management approach in Zimbabwe

In Zimbabwe the Community Based Natural Resources Management is practiced under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE). The programme started in 1988 and Nyaminyami Rural District Council and the then Mbire Rural District Council were the pioneers in starting to implement it. Nyaminyami has 12 wards and 11 of them partake in the CAMPFIRE programme. The concept is to ensure that the local communities are benefiting from the sustainable utilization of their natural resources. The major source of the revenue for the community under this programme is the sport hunting. The district has three hunting concessions namely Omay Area1 under Bulembi Safaris t/a Martin Pieters safari, Omay area 2 under Safrique safaris and Gache Gache Area 3 under Track-A-Hunt safaris. The funds derived from this source are channeled straight to the producer communities for community developmental projects. The district has got a department of wildlife which together with other stakeholders combats illegal exploitation of natural resources as realized as of economic and social importance. Below is revenue accrued from 2013 to 2014, projects implemented by respective wards and law enforcement efforts.

NYAMINYAMI RURAL DISTRICT COUNCIL

BULEMBI SAFARIS/ MARTIN PIETERS SAFARIS TROPHY FEES FOR TROPHY FEES JANUARY.....DECEMBER 2013

MOLA WARD 3

Species	Sex	Number killed	Unit Price $	Total Price	45% dividend to the ward
Elephant	M	3	9100	27300.00	12285.00
Elephant	Tuskles	3	2100.00	6300.00	2835.00
Buffalo	M	16	2100.00	33600.00	15120.00
Buffalo	F	5	750.00	3750.00	1687.00
Leopard	M	6	2550.00	15300.00	6885.00
Zebra		8	800.00	6400.00	2880.00
Impala	M	11	160.00	1760.00	792.00
Crocodile		7	1750	12250.00	5512.50
Baboon		9	25.00	225.00	101.25
Warthog	M	1	250.00	250.00	112.00
Hippos		9	1800.00	16200.00	7290.00

Bushbuck	M	10	500.00	5000.00	2250.00
Kudu	M	3	800.00	2400.00	1080.00
Klipspringer	M	1	400.00	400.00	180.00
Duiker	M	1	100.00	100.00	45.00
Hyena		2	220.00	440.00	198.00
Lion	M	1	5000.00	5000.00	2250.00
Porcupine		1	30.00	30.00	13.50
Total				**147045**	**66170.00**

SAFRIQUE SAFARIS TROPHY FEES FOR TROPHY FEES JANUARY .....DECEMBER 2013

Species	Sex	Number killed	Unit Price $	Total Price	45% dividend to the ward
Crocodile		1	1750.00	1750.00	787.50
Impala	M	1	160.00	160.00	72.00
Total				**1910.00**	**859.50**

BULEMBI SAFARIS TROPHY FEES FOR JAN .....DEC 2013

MOLA WARD 4

SPECIES	SEX	NUMBER KILLED	UNIT PRICE US $	TOTAL PRICE US$	45% DIVIDEND TO THE WARD
Elephant T/less		5	2100.00	10500.00	4725.00
Buffalo	M	10	2100.00	21000.00	9450.00
Buffalo	F	1	750.00	750.00	337.50
Impala	M	20	160.00	3200.00	1440.00
Impala	F	6	90.00	540.00	243.00
Hippos		8	1800.00	14400.00	6480.00
Bushbuck	M	7	500.00	3500.00	1575.00
Waterbuck	M	11	1400.00	15400.00	6930.00
Leopard	M	1	2550.00	2550.00	1147.00
Zebra		3	800.00	2400.00	1080.00
Crocodile		4	1750.00	7000.00	3150.00
Kudu	M	2	800.00	1600.00	720.00
Klipspringer	M	1	400.00	400.00	180.00
Baboon		2	25.00	50.00	22.50
Warthog	M	1	250.00	250.00	112.50
Monkey		1	15.00	15.00	6.75
Sable	M	1	2200.00	2200.00	990.00
Ducks		1	5.00	5.00	2.25
Total				**85760.00**	**38 592.00**

SAFRIQUE SAFARIS/ Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013

MOLA WARD 4

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
HIPPOPOTMUS	M	4	1800	7200	3240
CROCODILE	M	2	1750	3500	1575
ZEBRA	M	1	800	800	360
IMPALA	M	3	160	480	216
TOTAL				**11980.00**	**5391.00**

SAFRIQUE SAFARIS / Martin Pieters safaris TROPHY FEES FOR TROPHY FEES JANUARY.....DECEMBER 2013

NEBIRI WARD 7

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
ELEPHANT	M	1	9100	9100	4095
ELEPHANT	TIUSKLESS	2	2100	4200	1890
BUFFALO	M	12	2100	25200	11340
BUFFALO	F	3	750	2250	1012
LEOPARD	M	2	2550	5100	2295
ZEBRA	M	2	800	1600	720
IMPALA	M	2	160	320	144
BABOON	M	7	25	175	78.75
HYEANA	M	2	220	440	198
KLIPSPRINGER	M	1	400	400	180
KUDU	M	1	800	800	360
TOTAL					**22 313.25**

BULEMBI SAFARIS / Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013

NEBIRI WARD 7

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
BUFFALO	M	2	2100	4200	1800
TOTAL					**1800**

SAFRIQUE SAFARIS/ Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013

MSAMPAKARUMA WARD 9

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
ELEPHANT	TUSKLESS	2	2100	4200	1890.00
BUFFALO	M	3	2100	6300	2845.00
LEOPARD	M	1	2550	2550	1147.00
KUDU	M	1	800	800	360.00
BUFFALO	F	1	750	750	337.00
BABOON	M	2	25	50	22.50
TOTAL					6592.50

BULEMBI SAFARIS

BUFFALO	M	1	2100	2100	945.00

Mola ward 3 wildlife project dividends 2014 by Bulembi safaris/ Martin Pieters safaris

SPECIES	SEX	NO.KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Elephant	m	2	9 100.00	18 200.00	8 190.00
Elephant	t/l	3	2 100.00	6 300.00	2 835.00
Buffalo	m	10	2 100.00	21 100.00	9 450.00
Buffalo	f	1	750.00	750.00	337.50
Hippo		12	1 800.00	21 600.00	9 720.00
Waterbuck	m	2	1 400.00	2 800.00	1 260.00
Crocodile		9	1 750.00	15 750.00	7 087.50
Lion	m	1	5 000.00	5 000.00	2 250.00
Leopard	m	3	2 550.00	7 650.00	3 442.50
Spotted hyena		6	220.00	1 320.00	594.00
Impala	m	8	160.00	1 280.00	576.00
Impala	f	6	90.00	540.00	243.00
Bushbuck	m	6	500.00	3 000.00	1 350.00
Baboon		12	25.00	300.00	135.00
Civet cat		1	100.00	100.00	45.00
Warthog	m	1	250.00	250.00	112.50
Jackal		1	80.00	80.00	36.00
Klipspringer	m	1	400.00	400.00	180.00
TOTAL					48 874.00

Mola ward 4 Tayanda wildlife project dividends for 2014 by Bulembi safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Elephant	M	1	9 100.00	9 100.00	4 095.00
Hippo		5	1 800.00	9 000.00	4 050.00
Impala	M	9	160.00	1 440.00	648.00

Impala	F	3	90.00	270.00	121.00
Kudu	M	1	800.00	800.00	360.00
Sable	M	2	2 200.00	4 400.00	1 980.00
Crocodile		1	1 750.00	1 750.00	787.50
Baboon		1	25.00	25.00	11.25
Bushbuck	M	1	500.00	500.00	225.00
Waterbuck	M	1	1 400.00	1 400.00	630.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Zebra		1	800.00	800.00	360.00
TOTAL				32.035.00	14 415.75

Nebiri ward 7 wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
Leopard	M	3	2 550.00	7 650.00	3 442.50
Kudu	M	1	800.00	800.00	360.00
Hyena		1	220.00	220.00	99.00
Impala	M	1	160.00	160.00	72.00
Impala	F	1	90.00	90.00	40.50
Baboon		3	25.00	75.00	33.75
TOTAL				11 095.00	4 992.75

Kasvisva ward 8 wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Bushbuck	M	1	500.00	500.00	225.00
Elephant	t/l	2	2 100.00	4 200.00	1 890.00
Total				9 350.00	4 207.50

Msampakaruma ward 9 (Ndechedu) wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO, KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
TOTAL				2 100.00	945.00

Mola ward 3 wildlife project dividends 2014 by Safrique safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND

Hippo	m	4	1 800.00	7 200.00	3 240.00
Lion	m	2	5 000.00	10 000.00	4 500.00
Bushbuck	m	2	500.00	1 000.00	450.00
Buffalo	m	1	2 100.00	2 100.00	945.00
Baboon	m	1	25.00	25.00	11.25
Duiker	m	1	100.00	100.00	45.00
Spotted hyena	m	1	220.00	220.00	99.00
Klipspringer	m	1	400.00	400.00	180.00
Waterbuck	m	1	1 400.00	1 400.00	630.00
TOTAL					10 100.25

Mola ward 4 Tayanda wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO .KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Waterbuck	M	2	1 400.00	2 800.00	1 260.00
Impala	M	2	160.00	320.00	144.00
Impala	f	1	90.00	90.00	40.50
Total				3 210.00	1 444.50

Negande ward 6 Luyando wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	m	2	2 100.00	4 200.00	1 890.00
TOTAL				4 200.00	1 890.00

Nebiri ward 7 wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Kudu	M	1	800.00	800.00	360.00
Klipspringer	M	1	400.00	400.00	180.00
Baboon	M	3	25.00	75.00	33.75
Buffalo	M	1	2 100.00	2 100.00	945.00
Buffalo	F	2	750.00	1 500.00	675.00
Zebra		2	800.00	1 600.00	720.00
Duiker	M	1	100.00	100.00	45.00
Sable	M	1	2 200.00	2 200.00	990.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	2	160.00	320.00	144.00
TOTAL				11 645.00	5 240.25

Kasvisva ward 8 wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Waterbuck	M	1	1 400.00	1 400.00	630.00

Elephant	t/l	3	2 100.00	6 300.00	2 835.00
S. Hyena	M	2	220.00	440.00	198.00
Buffalo	M	3	2 100.00	6 300.00	2 835.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	1	160.00	160.00	72.00
Impala	F	1	90.00	90.00	40.50
Baboon		2	25.00	50.00	22.50
Total				17 290.00	7 780.50

Msampakaruma ward 9 (Ndechedu) wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	2	2 100.00	4 200.00	1 890.00
Hyena	M	2	220.00	440.00	198.00
Total				4 640.00	2 088.00

Msampakaruma ward 10 (Nyamambishi) wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	1	160.00	160.00	72.00
Grysbok	M	1	80.00	80.00	36.00
Total				2 790.00	1 255.50

Msampakaruma 10 (Nyamambishi) wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO, KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945,00
Total				2 100.00	945,00

Summary of funds disbursed to the communities

Year	Ward	DIVIDEND RECEIVED US$
2013	GACHE GACHE 2	19,834.88
	MOLA 3	67,029.5
	MOLA 4	43,983.00

	NEBIRI 7	**24,113.25**
	MSAMPAKARUMA 9	**7,537.5**
2014	GACHE GACHE 2	**25 353.00**
	MOLA 3	**58 974.00**
	MOLA 4	**15 860.25**
	NEGANDE 6	**1 890.00**
	NEBIRI 7	**10 233.00**
	KASVISVA 8	11 988.00
	MSAMPAKARUMA 9	3033.00
	MSAMPAKARUMA 10	2200.50

PROJECTS IMPLEMENTED BY THE COMMUNITY UNDER CAMPFIRE FUNDS

WARD	PROJECTS IMPLEMENTED
2 GACHE GACHE	Constructed GacheGache Sec School Classroom block
	Purchased GacheGache Sec School furniture
	Renovated GacheGache Sec Sch Teachers House
	GacheGache Pry Sch Repainting
3 MOLA	Constructed Musampa Fishing Camp Toilets
	Borehole Repairs & Maintenance
	Constructed Ward Office Toilets
	Purchased materials for construction of Mangwara School Teachers House
	Mola Pry Sch Computer room buglar bars
	DhobeSatelite School
	Construction of Kasiya Pre- School shed
	Dhundwe Pre-School renovation
4 MOLA	Kauzhumba Pipeline Food
	Traditional Ceremonies
	Brick Moulds (bricks for Mayovhe classroom block to be constructed)
	Purchased materials for construction of Jongola Primary School Teachers House
	Completion of Mayovhe Primary School Classroom Block -
	Rehabilitation of Marembera Pipeline
7 NEBIRI	Rehabilitation of Biri Water Pipe Line
	Construction of feeder roads
	Tractor Repairs & Fuels

	Ward Office Repairs & Maintenance
	Maya Pre - School Repairs & Maintenance
8 KASVISVA	Constructed Manhanga Pry School 1x2 classroom block
	Constructed Mamvuramachena Sec Sch 1x2 classroom block
	Constructed Mamvuramachena Pry Sch Admin block
	Renovated Mangare Pre- School
	Constructed Mutengu School Teachers Cottage
	Constructed SawiraMakwande Teachers Cottage
	Construed Black Boards for 2 satelite schools
9 MSAMPAKARUMA	Majazo Primary School Teachers House Repairs
	Chidyamugwamu Secondary School Teachers House Repairs
	Purchased materials for construction of Majazo classroom block

Wildlife anti-poaching efforts

Year	Number of patrolled done	Snared recovered	Recoveries	Animal poached	Number of poachers arrested
2013	139	76 cable snares	3 x303rifles 1x 458 rifle 10 rounds of AK47 30 rounds of	8 elephants 1 waterbuck 3 impala I buffalo	25 in connection of ivory dealing 51 in different wildlife counts
2014	150	89 cable snares	4 pairs of ivory 1 x30-06 Rifle plus 2x 30-06 Rounds 3 X Banana boats plus 3 800Mitres twine nets and 17KG of dried fish 1x Pick, 1 x Shovel Plus crow bar	2 buffalo 7 elephants 2 impalas 1 duiker	15 in connection of ivory dealings 32 of different counts including fish poaching

CONSERVATION FORCE
A Force for Wildlife Conservation

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay
† Bert Klineburger

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May 3, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041

Re: Supporting information for applications PRT 84787C and PRT 78392C

Dear Ms. Barry:

Enclosed please find information to further support the enhancement generated by regulated hunting for two import permit applications that we believe have been assigned to you.

- The first, PRT 84787C, is hunting with Martin Pieters Safaris in Zimbabwe. Mr. Pieters responded to some questions about the anti-poaching and community benefits generated by hunting in the Matetsi Safari Area. Please consider this information in making a positive enhancement finding for this applicant, and please consider the Non-Detriment Finding submitted by the Zimbabwe Parks and Wildlife Management Authority (October 2016), which provides information about the benefits of regulated lion hunting in Zimbabwe's Safari Areas.
- The second, PRT 78392C, is hunting with Gary Duckworth in Save Valley Conservancy in Zimbabwe. We have previously submitted extensive information about SVC, but the operator has provided more. Among other things, this information demonstrates the operator's commitment to habitat conservation and anti-poaching, and the scientific process employed in ensuring healthy wildlife populations and sustainable use. Please note, the operator has also provided more specific information about the location of this hunt (e.g., GPS coordinates and the closest city). He has also provided the PH name. This was not initially provided because this applicant submitted the application prior to release of the new forms. Finally, the operator has corrected the "shipper" for what was question 4 and is now question 8 (the name and address of the person or business shipping the trophy). Would you please substitute this corrected information in place of Mr. Duckworth's name when the final permit is issued. Please let me know if you have questions, and please consider the enclosed information in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

CC: Acting Chief, Branch of Permits

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mar 30 2018 2:00:00; Acknowledgement letter for Permit No. "84787C""

Eubulus Ker(b) (6) Fri, Mar 30, 2018 at 4:07 PM
To: "regina.lennox@conservationforce.org" <regina.lennox@conservationforce.org>, "cf@conservationforce.org" <cf@conservationforce.org>

FYI
Sent from my iPhone

Begin forwarded message:

> **From:** SPITS-II Production Email Messenger <permits@fws.gov>
> **Date:** March 30, 2018 at 11:00:03 AM PDT
> **To:** (b) (6)
> **Cc:** <permits@fws.gov>
> **Subject: Mar 30 2018 2:00:00; Acknowledgement letter for Permit No. "84787C""**
> **Reply-To:** <permits@fws.gov>
>
> EUBULUS(b) (6) KERR III
> (b) (6)
> SHREVEPORT, LA 71106
> U.S.A.
>
> Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 03/30/2018; check number 360 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA84787C-0
>
> While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.
>
> While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

enhancement details

Martin Pieters (b) (6) Wed, Apr 11, 2018 at 9:45 AM
To: regina.lennox@conservationforce.org
Cc: aaron Baker (b) (6), Aaron Baker (b) (6), "Eubulus Kerr, (b) (6)

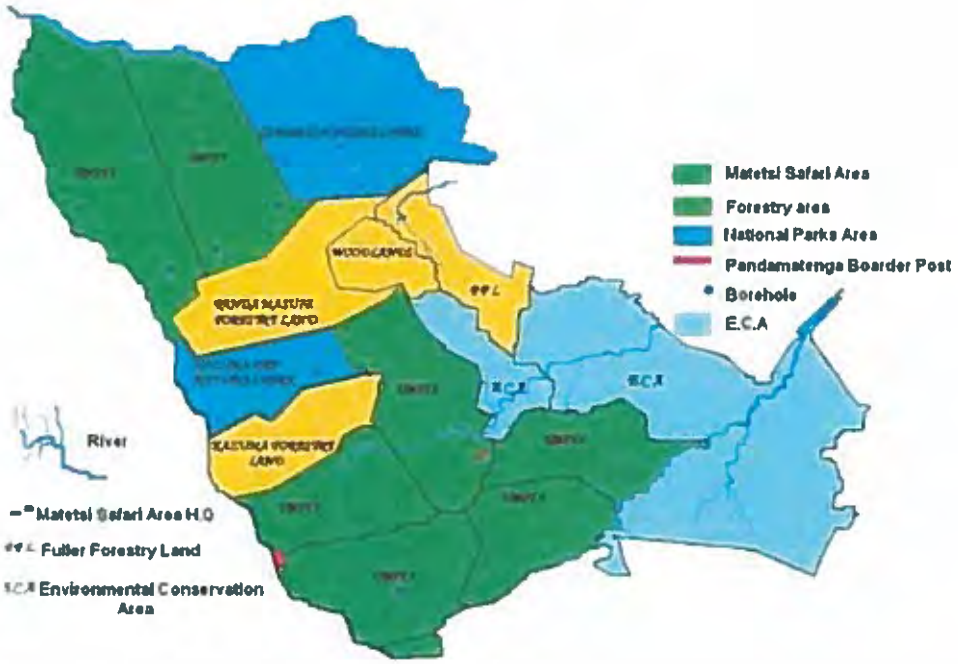
Dear Regina

Sorry for the delay.
I actually have two USA clients hunting lion, Aaron baker (b) (6) actually he has hunt shot his lion with me and will be in touch) and Eubulus Kerr (b) (6)

Both lions will be hunted in the MATETSI region which is a controlled hunting area governed by the Zimbabwe National Parks and Wildlife Authority.

1.

MAP II: MATETSI SAFARI AREA SHOWING THE SIX HUNTING UNITS, KAZUMA, PANDAMASUIE AND ICA.



2. The wildlife authority has all its own reports as they are in contra of the Matetsi safari areas.

3. The ZNPWA have been in control of the Matetsi safari areas for over 40 years and does all its own armed anti poaching as well as community assistance on its boundaries

4. For periodic reports, the ZNPWA would have all those documents.

5. Arial surveys and 48 hour game counts are conducted annually in the Hwange national park which lies

adjacent to Matetsi safari area and forestry hunting blocks.

6. Armed rangers are paid by the department of national parks and they get rewarded for successful apprehension of poachers.

7. It is a safari area hence no villages actually live in the area, the villages surround the hunting area and they benefit fro meat and off take from hunting clients which benefits them through the successful CAMPFIRE program.

8. Zimbabwe has a minimum age of 5 years with penalties to safari operators and professional hunters if an underage animal is shot.

9. Hwange National park which adjoins the matetsi block has a dedicated research team and many collared lion for research purposes. The lion population has increased dramatically over the last 5 years due to minimal quotas, successful ageing and community involvement.

10. Matetsi safari area is home to the one of the largest free ranging herds of elephant and buffalo in Zimbabwe. There are no fences and it adjoins hwange national park and Botswana where unrestrained movement of wildlife occurs.

Regards

Martin

Martin Pieters
www.martinpieterssafaris.com
(b) (6) [redacted]

DISCLAIMER: The information in this message (and any attachments hereto) may be confidential and protected from disclosure. If the reader of this message is neither the intended recipient nor an agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized disclosure of this information is strictly prohibited. Any unauthorized disclosure may cause the breaching party to be liable for damages. If you have received this message in error, please notify the sender by replying to the e-mail message, and delete it from your computer without reading it or saving it in any manner.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""

3 messages

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Subject: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""
Date: February 26, 2018 at 11:30:01 AM MST
To: (b) (6)
Cc: <permits@fws.gov>
Reply-To: <permits@fws.gov>

ERIC M. JANDE
(b) (6)
PARKER, CO 80138
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/26/2018; check number 5497 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA78392C-0

While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.

While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Regina A. Lennox <regina.lennox.cf@gmail.com> Fri, Mar 23, 2018 at 9:51 AM
To: cf@conservationforce.org

Could you possibly call and get the legal examiner's name and email for this person? Thank you!

Begin forwarded message:

From: Eric Jahde (b) (6)
Date: March 22, 2018 at 1:24:56 PM CDT

> **To:** "Regina A. Lennox" <regina.lennox@conservationforce.org>
> **Subject: Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""**
>
> [Quoted text hidden]

John J. Jackson, III <cf@conservationforce.org> Mon, Mar 26, 2018 at 11:34 AM
To: "Regina A. Lennox" [redacted]

Case manager, biologist

Name: Ann Barry

Email: Anna_barry@fws.gov

Sorry. Called them back this morning. They never returned my call. - AT
[Quoted text hidden]
--

Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145
jjj@conservationforce.org • www.conservationforce.org

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mokore Safaris Lion Hunt

1 message

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: Regina Lennox <regina.lennox@conservationforce.org>

Hi Regina,
This is the forward of mailing from Gary Duckworth with proper info as we discussed. I will also forward the PRT mailing from the government.
Thanks very much for your help and please contact me at any time if I can help.
Regards,
Eric M Jahde
(b) (6)

Begin forwarded message:

From: Eric Jahde (b) (6)
Subject: Fwd: Mokore Safaris Lion Hunt
Date: March 21, 2018 at 5:26:00 PM MDT
To: Eric Jahde (b) (6)

Begin forwarded message:

From: "Gary Duckworth" (b) (6)
Subject: RE: Mokore Safaris Lion Hunt
Date: March 8, 2018 at 8:41:56 PM MST
To: (b) (6)
Cc: "'Rob Oostindien'" (b) (6) "'Neil Duckworth'" (b) (6)

Good morning Eric,

I hope this finds you well and being successful with your application. I see a recent ruling by USFW is favourable. I thought to send you some information that may help with your application. Sorry I didn't send before but forgot I had these. I have attached some notes that I had written up before. Also attached are our leopard data from Mokore just to show our healthy predator population and also the data we use to try and ensure we judge the lion's age correctly from our trail camera pictures. Also a copy of our PH rules sent to any PHs operating in our areas showing the seriousness we have to ensuring the right animals are harvested. Don, do you have any more recent counts on the SVC lions. I think he last year's count was 225. Still 75 lions above what our ecologists say is

sustainable. I have also copied in a document Neil did on Conservation Through Hunting which shows our companies dedication to these areas even though this is for Mozambique it is our company MO.

Answers that you may need from the permit application if not already done:

1. Page 3, #5 a and c.
2. Page 4, #8.
3. Page 4, #9 a, b, and c.

Page 3 5a) Mokore and Umkondo Ranches, Save Valley Conservancy, Bikita District, Masvingo Province. South Eastern Lowveld. Closest cities Masvingo and Mutare. Mokore Camp – S 20 24' 12.01" E 032 07' 01.88"

5c) Mokore Safaris, Gary or Neil Duckworth as PHs. Gary PH license number 96. Neil PH license number 94.

Page 4 8) Name: Cuan Meredith
Company: Trophy Consultants International
Address: 4 Josiah Chinamano Road, Belmont
City: Bulawayo
Province: Matabeleland
Country: Zimbabwe

9a) Please see attachments
9b) Please see attachments
9c) Please see attachments

I hope this all helps. Good luck.

From: Gary Duckworth (b) (6) [redacted]
Sent: Thursday, February 15, 2018 4:12 PM
To: (b) (6) [redacted]
Cc: (b) (6) [redacted] 'Rob Oostindien'
Subject: RE: Mokore Safaris Lion Hunt

Hi Eric,

Thank you. Lynn will send you a list of things she needs for processing permits, etc. Good luck with the permit.

From: (b) (6) [redacted]
Sent: Wednesday, February 14, 2018 4:50 PM
To: Gary Duckworth
Subject: Re: Mokore Safaris Lion Hunt

Thank you Gary,
My application is in the works with John Jackson's help. I will wire the deposit to your account here in Mississippi today for the lion hunt in October 2018. Is there any other paper work that I need to start with you?
Eric Jahde

Sent from my iPhone

On Feb 14, 2018, at 7:35 AM, Gary Duckworth (b) (6) [redacted] wrote:

> Good afternoon Eric,
>
> I hope this finds you well. Rob had asked me to assure you that should you not get the import permit for the lion into the USA that we would either return your deposit to you or allow you to roll it over to another year or safari. All deposits are held in an account in Mississippi with our agents at African Horizons. Should your application be turned down for the import of the lion then they (African Horizons) can easily return your deposit should that be your wish. Looking at the fish and game website I am fairly confident that your application should have a positive outcome especially since the Save has not only enough lions, but possibly too many! Please do not hesitate to contact me should you have any further queries.
>
> <image001.jpg>
> <image002.jpg>

10 attachments

Kind regards

Gary Duckworth

Mokore Safaris
7 Stable Close
Borrowdale, Harare
Zimbabwe

Phone +263-(0)4-883462
Mobile +263-(0)772 260-179
skype gary.duckworth3
www.mokoresafaris.com
www.mokoreecosafaris.com

image001.jpg
30K

image002.jpg
6K

Habitat Enhancement Report- Mokore Safaris Zimbabwe.docx
20K

Leopard Data.pdf
3571K

aging_the_african_lion.pdf
5125K

Mokore Safaris PH Rules.pdf
176K

SVC Predators 2015.docx
26K

Zimbabwe Rates 2018.pdf
508K

AN EXAMPLE OF CONSERVATION THROUGH HUNTING [5741].docx
9659K

USFWS Lion Permit App.pdf
70K

Mokore Safaris (Pvt), Ltd.
7 Stable Close, Borrowdale, Harare, Zimbabwe.
Operator: Duckworth Family.
garyduckworth@mokore.com
Operating in: Save Valley Conservancy and Sengwa Research Management Area

I. DESCRIPTION OF COMPANY AND CONCESSION

Mokore Safaris has been operating in Save Valley since it's conception in late 1992. It also has been operating the the Sengwa Research Management Area since January 2013. (This is a 5 year lease with first option to roll over for a further 5 years). The Mokore Safaris section in the Save Valley is 35500 acres and provides habitat for a range of species including black and white rhino, buffalo, lion, leopard, cheetah, crocodile, wild dogs, hippo, kudu, eland, elephant, impala, bushbuck, bushpig, hyena, warthog, zebra, giraffe, waterbuck and sable (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc. Sengwa Research is 94000 acres and is home to elephant, buffalo, lion, leopard, crocodile, kudu, eland, impala, bushbuck, bushpig, hyena, warthog, zebra, reedbuck and waterbuck (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc.

Our company is family-owned and has been operating in this country since 1979. We employ three full time professional hunters, 3 part time Professional Hunters and also 48 men, 5 ladies and 2 casual labour. Altogether our operations support at least 600 dependents in local villages through our continual work on the schools, roads and dams in the neighbouring village areas. Also supplies of meat and school equipment benefits the surrounding communities.

We have a written concession plan with anti-poaching and community components....

II. ANTI-POACHING COMPONENT

Mokore Safaris maintains a 8 man anti-poaching team at an annual cost of over $60,000 in the Save Valley Conservancy and supplement Zimbabwe Parks and Wildlife Authority anti-poaching team with a vehicle driver and four rangers in the Sengwa Research Area.... Each team is equipped with a four-by-four vehicle, uniforms and boots, tents, rations, and radios. Our teams closely cooperate with the Wildlife Authority to conduct daily patrols of the concession and the neighboring properties that were taken during the land reform programme. We supply rations once a week to our scouts and assist the government game scouts in acquiring rations to ensure they are sufficiently equipped for the patrols.

We heavily patrol our areas, conducting approximately 3 patrols per day by vehicle and foot in the Save and the same again in Sengwa Research. In the past year, our teams picked up numerous snares and arrested numerous poachers hunting with dogs. Also in the Sengwa Research Area our teams with Zim Parks Rangers have arrested and also killed a number of ivory poachers. Removing snares protects the lion population by reducing incidental snaring.

We also send out road crews annually to redo the roads in the concessions, to ensure we are able to patrol effectively. These are maintained throughout the year.

In 2015, Mokore Safaris (Zimbabwe) spent approximately $100,000 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 4000 liters of diesel for patrol vehicles. We also spent $ 5500 on diesel for pumping water for wildlife in areas where there is not enough natural water for wildlife to survive. This does not include the costs of water pump and engine maintenance. And we made over $ 4000 in payments of rewards.

COMMUNITY PARTICIPATION

A. Community Assistance Component

Although there are no villages in the concession itself, we share four borders (three in Sengwa and one in Save Valley) with a heavily populated communal district. We make contributions to the two closest villages and the district council. We lease an adjacent area to the concession from the council, and pay a lease fee as well as 85% of trophy fees to the Bikita Rural District Council.

We pledge an annual contribution of at least $10,000 + in projects to the villages. We ask for a list of preferred projects at each local school and clinic. We also do the main roads annually in the Village 26, Bikita and Muchiringi Districts. We annually dredge the local dams. We supply all meat taken from any elephants harvested on our concessions to the local communities as well as supplying meat for any State Functions.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. This applies to livestock losses through predation too. We obviously try and use all means to discourage problem animals before having to take more drastic control measures.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession including over 30km of piping and 12 waterholes. We drilled, operate, and maintain two boreholes and numerous pans. Pumping costs (diesel usage only) is +-$ 5500/annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base.

V. OTHER INFORMATION

A. Prey Base

Mokore Safaris along with our other partners in the Save Valley Conservancy's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past twenty five years. Please see attached report on the game numbers increases and lion surveys report. In Sengwa research Area we estimate that our plains game (buffalo, kudu, sable, etc.) have increased by 15-20% in the last 3 years. Also, much of our anti-poaching and community assistance efforts are aimed to reduce livestock encroachment into the concession.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Save Valley Conservancy does an annual spoor survey for predators as well and an aerial survey for other species. Due to the fact that we keep tabs on the lion in our concession, we are

assured that the regulated, limited offtake is sustainable. In Sengwa Research we use trophy and age monitoring of all species hunted and manager estimates to regulate our offtakes.

C. Lion Aging Approach

Mokore Safaris has been following an age-based policy for African lion trophies since 2012, when we adopted a company rule not to harvest lion below five years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective.

D. Lion Hunting Revenue

Lion are our highest-value species. We require 21-day safaris for lion. Our daily rate is $2,500 per day, plus a trophy fee of $15000 (lion). Without this revenue plus the revenue we have already lost due the ivory import bans, our anti-poaching and habitat enhancement efforts will be seriously reduced.

E. U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

CONCLUSION

Mokore Safaris' regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

Signed: _____

Operator Name: Gary Duckworth

Title: Managing Director

Leopard Data 2015/2016

Mokore and Umkondo Ranch

Savé Valley Conservancy

Introduction

Leopards (*Panthera pardus*) are found throughout Mokore and Umkondo Ranches with in Savé Valley Conservancy (SVC). Mokore Safaris has been hunting leopard for numerous years as a form of trophy hunting or sustainable utilization. Trophy hunting consists of targeting mature male individuals, and as of more recent, individuals aging older than approximately four (4) years in age. The purpose of this document is to identify randomly selected bait sites and the leopards identified at these specific bait sites.

Method

The Professional Hunter or individual tasked with pre-baiting or baiting for leopard chose a randomly selected bait site in attempt to lure a male leopard into feeding. Due to the fact that females also utilize bait sites, records on any females feeding are also monitored. The selected bait sites are randomly chosen throughout Mokore and Umkondo Ranches. Camera traps or trail cameras are then placed at all bait sites. For identification purposes, it is attempted that all leopards captured feeding with the camera placed in such a manner that the right side of the leopard is photographed. This is however not always possible due to preferred bait site selection. It is thus recorded which side of the leopard pictures are taken of.

Male leopards are given names that aid in either easily identification of the cats or are named as per the bait site that they initially feed on. Females were named simply by property and in numerical order. For example, a female leopard feeding at the Gwezi River bait site on Mokore would be named MF001. If this female had a cub feeding alongside her, the cub would be named MJ001 and would have a recording that the cub belongs to MF001. Where MF is Mokore Female and MJ is Mokore Juvenile. The sex of each leopard was also recorded. For all juveniles the sex is recorded as unknown due to difficulties in identifying sex at a young age.

Photos are saved of all cats recorded either a right side, left side or both sides where possible. If a cat was found feeding on a different bait site, this was also recorded. An estimated age was also assigned to each male that was found feeding. The age was estimated using the Panthera ageing guidelines as well as PH age estimations.

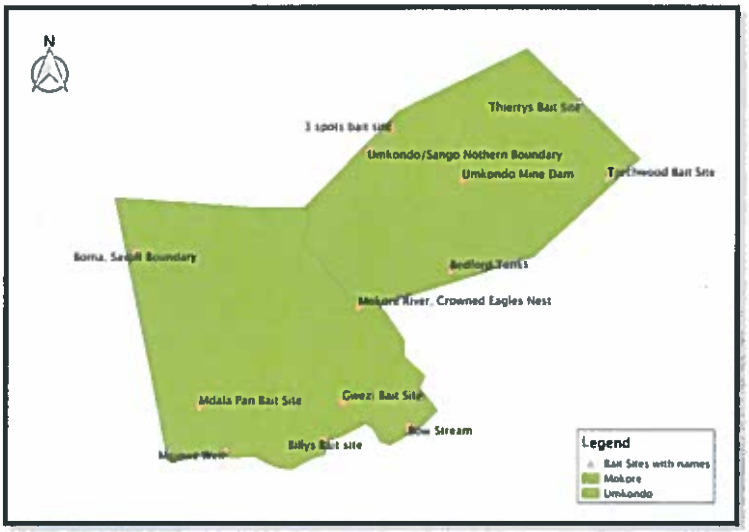


Image 1: Randomly selected bait sites throughout Mokore and Umkondo Ranches.

Results

Due to the fact that Mokore Safaris utilize two (2) properties, the data is classed into two groups, namely Mokore Leopard and Umkondo Leopard. A total leopard population is also determined due to the fact that holistically the same company treats these blocks as one management unit. It is to be mentioned that the data is based on some of 2015 and all of 2016 hunting season. Majority of the data for 2015 produced errors upon processing. However some data is made available on leopards being taken and locations thereof.

Mokore Leopard

The data gathered for Mokore is based on information gathered by randomly selected bait sites as mentioned above. It can be noted that a large portion of Mokore went without being baited, close on 2 000 ha. For the purpose of this document, this 2 000 ha was not excluded from the total area. It is hypothesized that this will have an effect on the total leopard numbers as well as leopard densities found on Mokore Ranch.

All data is separated into two classes, namely pre and post hunting. It is deemed that other males who in turn will occupy the available territory replace males removed from Mokore.

A. Pre-hunting leopard numbers and densities

Mokore Ranch is approximately 7 841 ha in size. A total number of fourteen (n=14) leopard were identified on seven (7) bait sites throughout Mokore. It can be noted that a total number of five (5) bait sites fell in close proximity to the Turgwe River. As previously mentioned, the centre and north-eastern area of Mokore was found free of baits. This does however not mean that no leopard utilize this area. A total number of five (5) males, six (6) females and three (3) juveniles were identified on Mokore.

Densities of Mokore resulted in 560 ha/leopard. Males had an average density of one (1) male per approximately 1 568 ha. Females and Juveniles having an approximate density of one (1) individual per 871 ha.

B. Post hunting leopard numbers and densities

For the purpose of the document, it is concluded that a total number of two (2) male leopards were removed from the population in 2016. This in turn results in a lower density of male leopard for Mokore. This density being approximately 1 000 ha larger per male in post hunting than what it was in pre-hunting conditions. It can however again be mentioned that these available territories will become occupied by other males moving into the area.

Umkondo Leopard

The data collection for Umkondo is done in the same manner as on Mokore. It can also be noted that on Umkondo, no bait sites were place within an area of approximately 1 300 ha in size, namely around the Mokore River west of the main road. This area is adjacent to that of the area that was not baited on Mokore Ranch.

A. Pre-hunting leopard numbers and densities

Umkondo Ranch is approximately 6 736 ha in size. A total number of eleven (11) leopards were identified on six (6) baits throughout Umkondo. A total of number of four (4) males were recorded, five (5) females and two (2) juveniles. A total density of approximately one (1) leopard per 612 ha presented itself on Umkondo. Males had an average density of 1684 ha per individuals. Females and Juveniles had an approximate density of 962 ha per individual.

B. Post hunting numbers and densities

A single (1) individual was removed from the population on Umkondo Ranch for 2016. As a result of this the male density differs approximately 560 ha greater per individual post hunting.

Combined Data

Combined a total of twenty five (25) leopard were identified, with an approximate density of 583 ha per leopard. Males having an approximate density of 2 429 ha per individual and females and juveniles 911 ha per individual. This data is based on the post hunting data. Numbers and densities will change pre-hunting season 2017 depending on whether or not available territories become occupied. A large area of approximately 3 300 ha has also gone un-baited. This will also affect leopard numbers and densities especially when considering females and possibly juveniles.

Discussion

When considering data pertaining to this document it is important to note that some leopards both on Mokore and Umkondo would have been missed due to numerous reasons. Main reasons are areas being devoid of baits and the possibility of males not feeding on baits is not to be ignored. It is hypothesized that the 2017 pre-hunting season will yield higher numbers and densities of leopards, especially males.

A total number of three (3) leopards were removed from the population in 2016, two (2) on Mokore and one (1) on Umkondo.

Table 1: Identification sheet of leopards on Mokore.

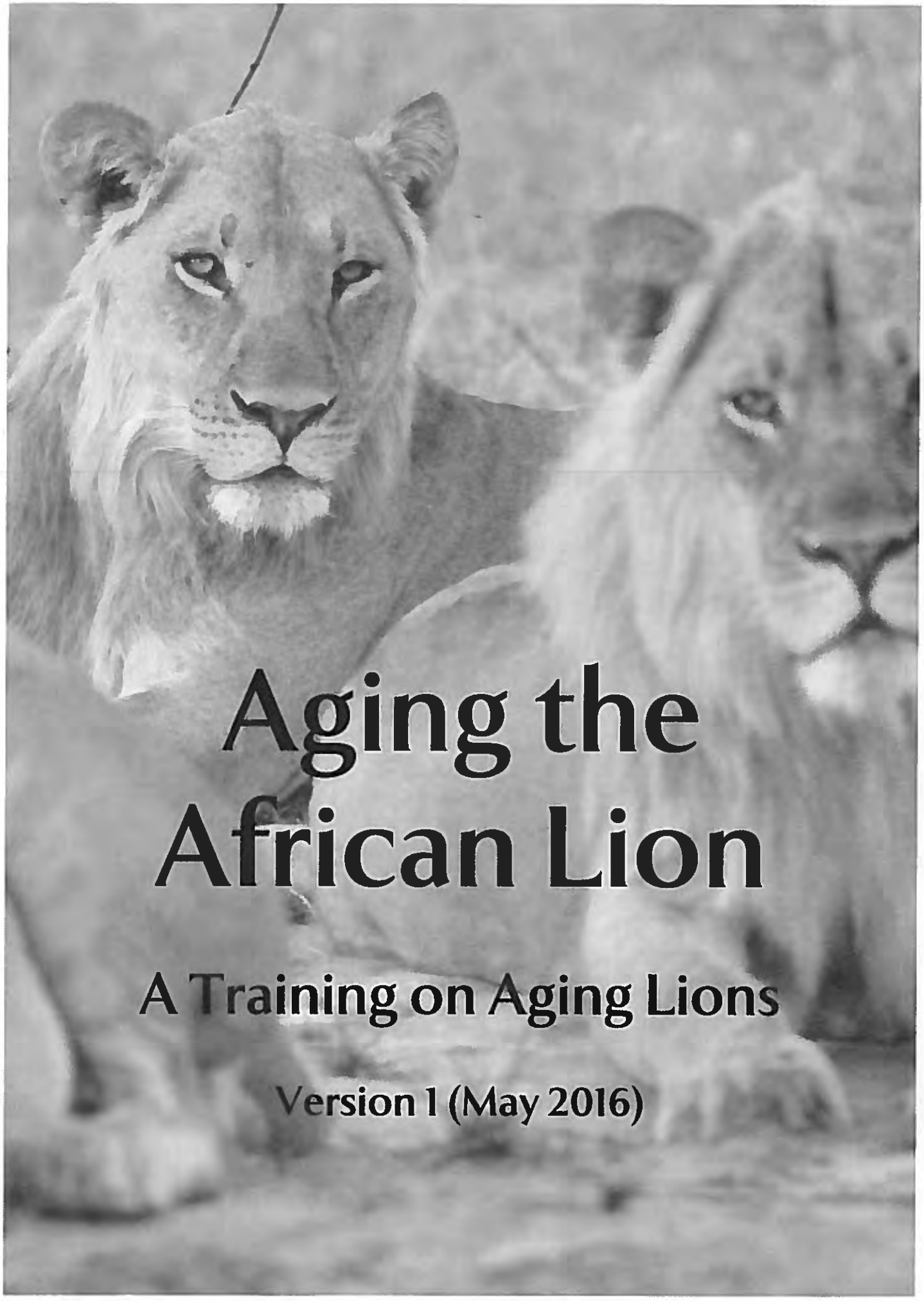
Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
Boma cat	M	3		Boma, Savuli Boundary	398805	7750153
MF001	F			Boma, Savuli Boundary	398805	7750153
JM001	Unknown		MF001	Boma, Savuli Boundary	398805	7750153
The King	M	4		Mdala Pan Bait Site	401161	7744365
Shlabata Cat	M	6		Billys Bait site	405746	7743229
MF002	F			Billys Bait site	405746	7743229
MF003	F			Gwezi Bait Site	406370	7744543
JM002	Unknown		MF003	Gwezi Bait Site	406370	7744543
2 Smile	M	3		Billys Bait site	405746	7743229
MF004	F			Mokore River, Crowned Eagles Nest	406968	7748034
MF005	F			Bow Stream	408794	7743750
Bow Cat	M	4		Bow Stream	408794	7743750
MF006	F			Majewe Weir	402133	7742862
JM003	Unknown		MF006	Majewe Weir	402133	7742862
Muchwa Cat	M	3		Majewe Weir	402133	7742862

*MF	Mokore Female
*JM	Juvenile Mokore
	Male removed from Population

Table 2: Identification sheets of leopards found on Umkondo.

Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
UF001	F			3 spots bait site	408167	7754697
5c	M	4		Umkondo Mine Dam	410765	7752730
Zizi Dip Cat	M	4		Thierrys Bait Site	415070	7755639
UF002	F			Thierrys Bait Site	415070	7755639
JU001	Unkown		UF002	Thierrys Bait Site	415070	7755639
Dick and Balls	M	4		Umkondo/Sango Nothern Boundary	407314	7753919
UF003	F			Umkondo/Sango Nothern Boundary	407314	7753919
UF004	F			Bedford Tanks	410316	7749369
UF005	F			Torchwood Bait Site	416065	7752784
JU002	Unkown		UF005	Torchwood Bait Site	416065	7752784
3 spot	M	5		3 spots bait site	408167	7754697

*UF	Umkondo Female
*JU	Umkondo Juvenile
	Male removed from population



Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Background and Applications

Lions in Africa

As the dominant predator in Africa, the African lion (*Panthera leo*) is highly valued for its ecological role and importance for the tourism industry. However, lions have declined by an estimated 42% over the past 21 years (3 generations) to approximately 20,000 individuals (Bauer et al. 2015). Robust tools for assessing and managing lion population dynamics are critical for survival of the species.

Why Age Lions?

Age is a common metric used throughout the world to guide the management, research and sustainable harvest of many types of wildlife, including large carnivores, ungulates and fish. Knowing an animal's age is critical for accurately estimating key elements of wildlife behavior and life history, such as reproduction, survival, movement and population size. Our ability to successfully conserve and manage wildlife depends on how well we understand each animal's social and biological role, which is closely tied to age.

Implications for Management and Research

Managers use population models based on the age structure of a population to help predict how different management scenarios or environmental stressors might affect the future of a species. Population models project a species' population size based on information about a species' life history, including conception rate, birth rate, survival of young, age at puberty, territoriality and other behavioural characteristics. The age or life stage of an animal is closely tied to its reproduction, survival, behavior, and other aspects of its ecology that can affect population stability. Thus, an animal's age in the context of its population can provide valuable information about the future of a single population and, for threatened species like the African lion, even the species as a whole.

For this reason, age is an important metrics collected by lion researchers. For example, researchers that collar individual lions must be able to accurately age the lions they study in order to understand lion behaviour in a broader context. Ensuring that lions have the natural resources and the protection that they require at different phases of their lives is critical for ensuring their conservation.

Importance for Sustainable Hunting

Lions are the only social big cats in the world. Each pride consists of 4-5 adult lionesses, their dependent cubs, and a temporary coalition of pride males. Pride males play a key role in defending their pride against invading males by forming coalitions of 2-3 males to defend the pride territory through roaring, patrolling, scent marking and aggressively approaching invading males. When new males enter a pride, they often kill cubs (a behavior termed "infanticide") in order to bring lionesses into estrus more quickly so they can produce offspring. Infanticide

Resources

Resources for Learning to Age Lions

The ability to accurately age lions takes time and practice to develop, but is the sign of a dedicated and accomplished expert who understands lion biology. We encourage you to take advantage of the other resources that were developed alongside this training by visiting http://AgingTheAfricanLion.org, including:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

Before You Begin: Test Yourself!

To see your improvement after taking this training, we encourage you to test your lion aging score online at http://AgingTheAfricanLion/TestYourself.org. When you finish the training, test yourself again!

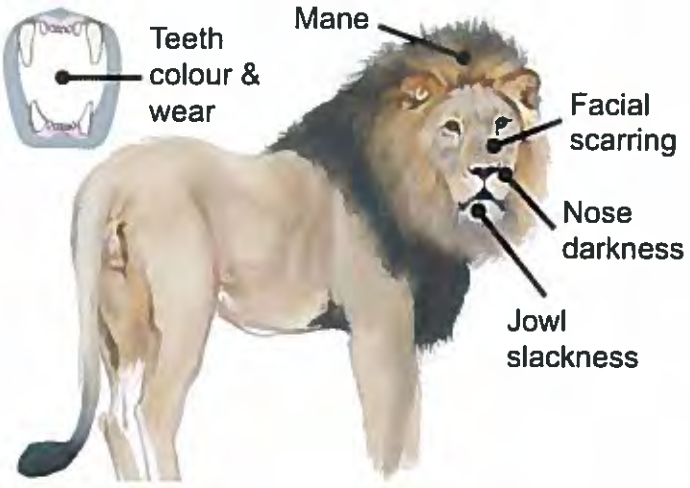
Training

How to Age a Lion

Scientific research on lions across Africa shows that a male lion's appearance changes with five main physical characteristics that can be distinguished into four age classes (Miller et al. 2016):

Aging Characteristics
- Teeth color and wear
- Facial scarring
- Nose darkness
- Mane
- Slack jowl

Age classes
1-2 years
3-4 years
5-6 years
≥7 years



Minor variation in each physical characteristic between lions of the same age means that a single trait should never be used alone to determine age: always reference 3-4 characteristics to reliably narrow down a lion's age. This will ensure the greatest accuracy possible.

Aging Characteristics

1. Teeth Color and Wear

Teeth become more yellow and worn with age.

1-2 years
White, sharp

3-4 years
Light yellow,
sharp or lightly worn

5-6 years
Light yellow,
lightly or heavily worn

≥7 years
Dark yellow, lightly
or heavily worn

2. Facial Scarring

Lions acquire scarring and pocketing on their faces due to fighting.

1-2 years
No scarring

3-4 years
No or light scarring

5-6 years
Light scarring

≥7 years
Heavy scarring

3. Nose Darkness

Lion noses darken from pink to black with age.

1-2 years
Mostly pink
0-30% black

3-4 years
Slightly black
20-60% black

5-6 years
Mostly black
40-70% black

≥7 years
Nearly all black
40-100% black

Next Steps

Photo Galleries & Pocket Guides

After finishing this training, check out the other resources available at http://AgingTheAfricanLion.org:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

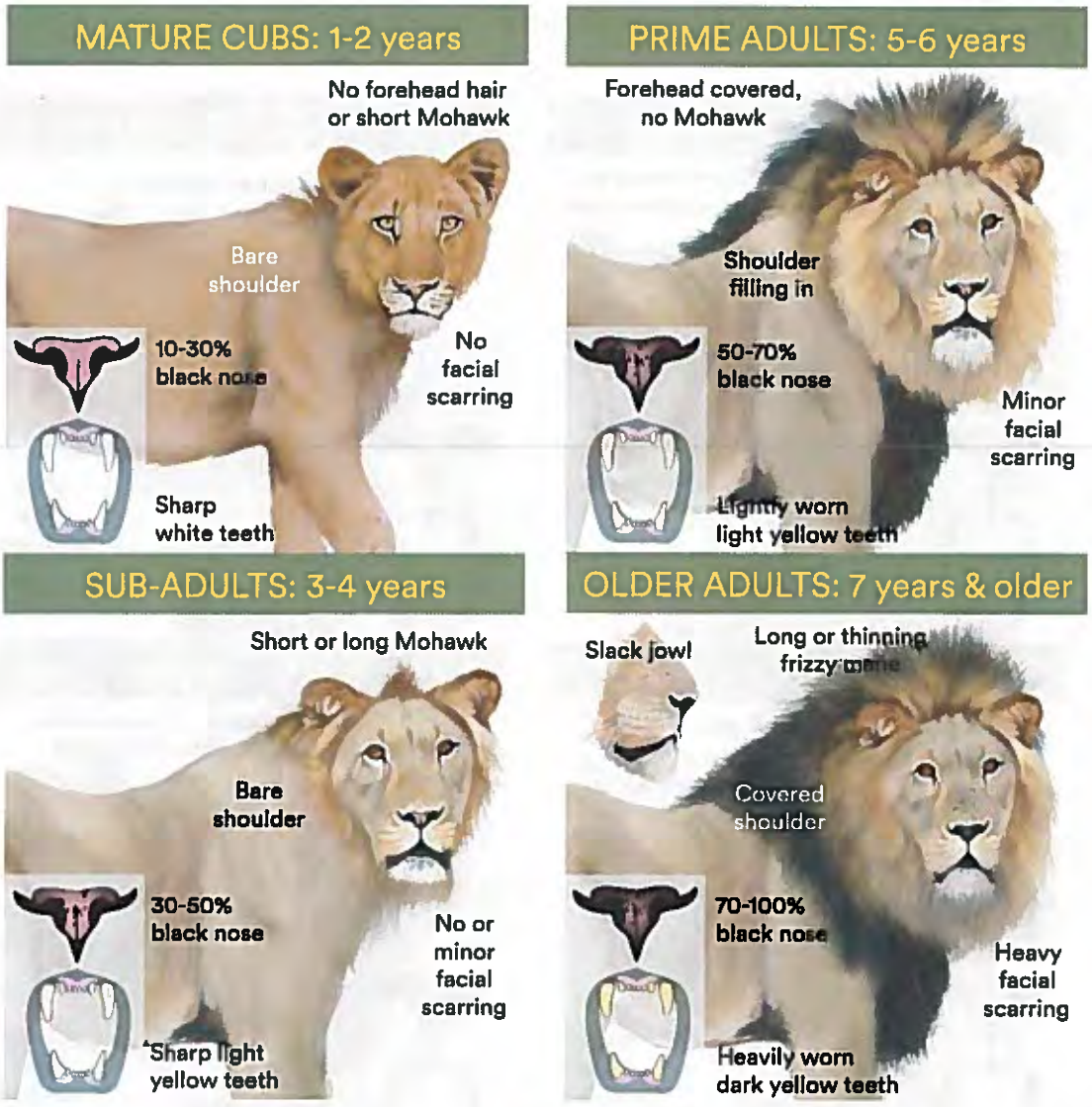
After You Finish: Re-Test Yourself

To see your improvement after reviewing this training and the online photos and pocket guides, re-test your lion aging accuracy online at http://AgingTheAfricanLion/TestYourself.org.

Pocket Guides

Pocket guides to use for quick reference in the field are available on the last pages of this course packet and online at http://AgingTheAfricanLion.org/Resources.html

Quick Guide to Southern and High-Lying Africa
(e.g. Hwange in Zimbabwe, Serengeti in Tanzania)



Available as complete pocket guide at http://AgingTheAfricanLion/Resources.org.

Mokore Safaris PH Rules

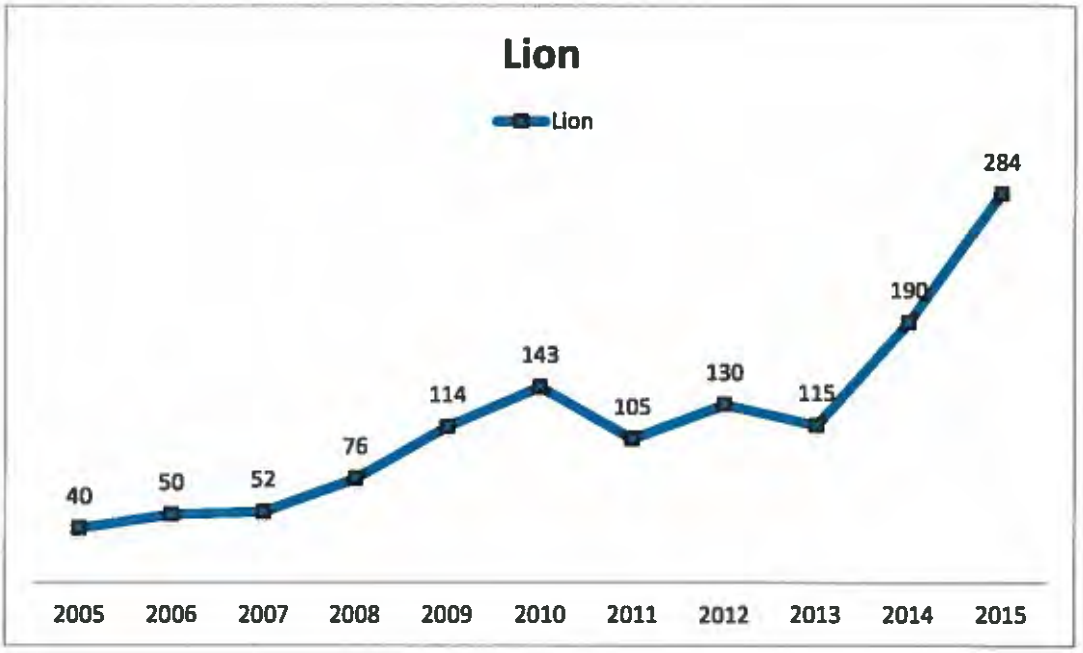
1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save Valley hunts please refuel at Nyika on the way in. For Sengwa Hunts please refuel at Gokwe.
2. Paperwork – Please can all PHs fill in the skinners books complete with all measurements and details. Also those hunting in Sengwa please make sure that the measurements of all trophies is completed on the ZPWMA kill returns supplied in the file.
3. Mokore Safaris is attempting to maintain the quality of our herds for the future and so the following will apply (no excuses tolerated):
   a. Any soft – top buffalo will attract a fine as follows:
      i. Over 43" spread - $1000
      ii. 40 – 43" spread - $500
      iii. 35 – 40" spread - $ 200
      iv. Below 35" – fire at will!

b. Any lion under the age of 5 years - $ 10 000
c. Any sable without at least 2" secondary thickening - $200
d. Any elephant under 40 lbs in the Save - $500

SVC Predators 2015

When considering species such as Lion, Leopard and Spotted Hyena, all which are Trophy hunted within the SVC, it is clear that hunting has aided the conservation of these species (Groom 2012). Population trends below show slight fluctuation and a steady increase of Lion and Leopard within the SVC. *The recent decrease in Spotted Hyena numbers can be contributed to a rapid increase in lion numbers and species competition.* Further details can be seen in *Lion Hunting in Zimbabwe's Savé Valley Conservancy, A Conservation Success Story, Dr Rosemary Groom, African Wildlife Conservation Fund.*

Populations of Lion (*Panthera leo*) , Leopard (*Panthera pardus*) and Spotted Hyena (*Crocuta crocuta*) can be depicted as follows:



ıge 1: Population trends for Lion of the SVC from 2005 to 2015.

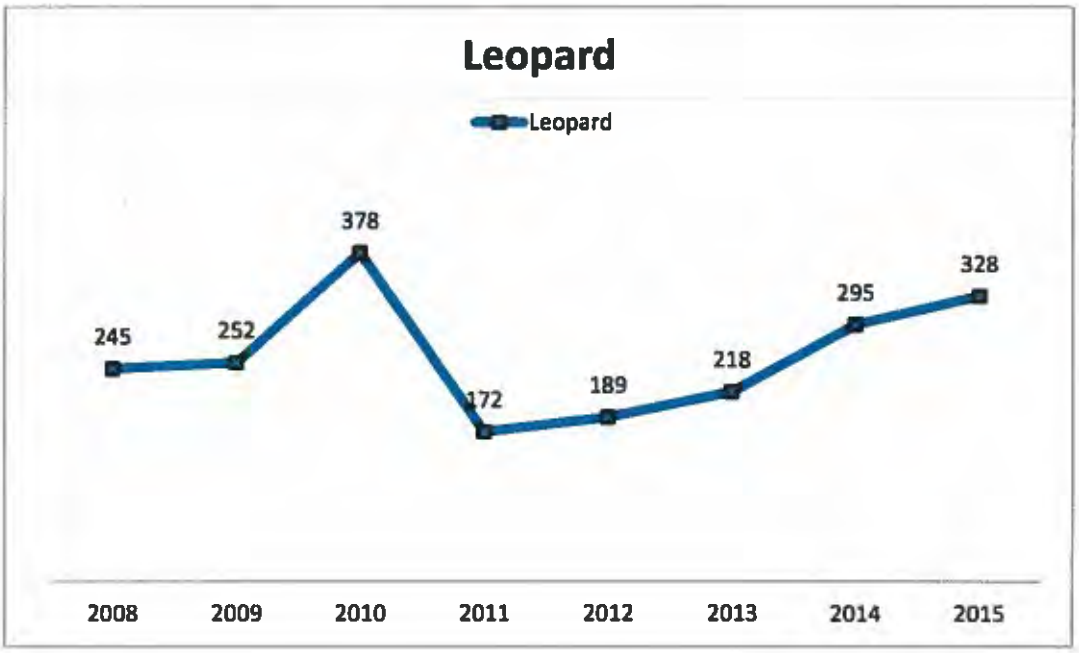


Image 2: Population trends of Leopard for the SVc from 2008 to 2015.

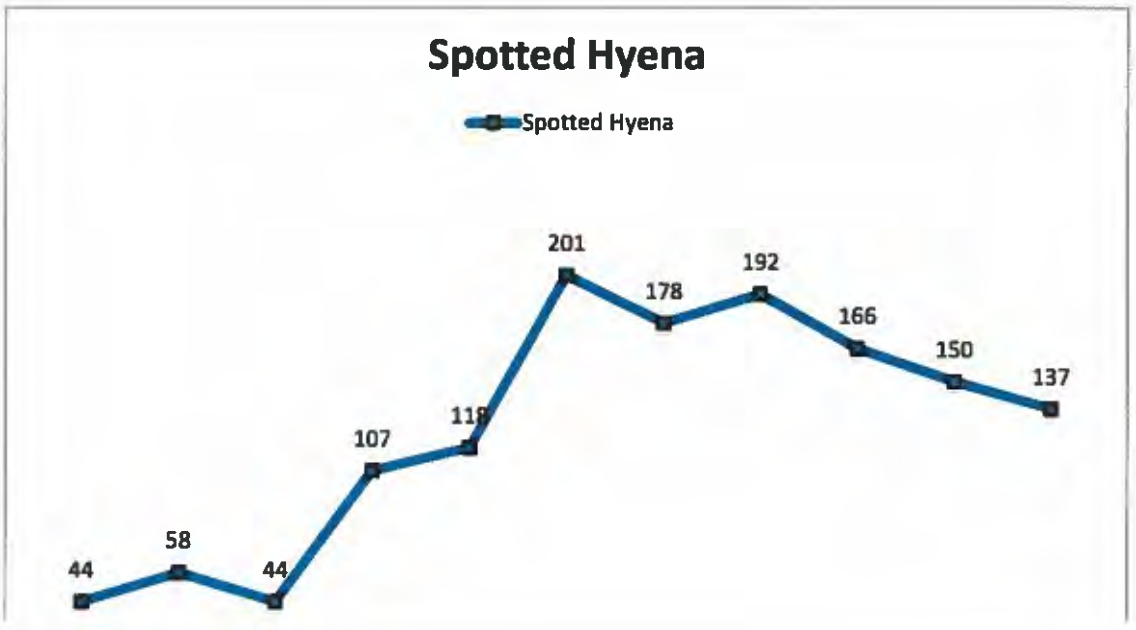


Image 3: Population trends for Spotted Hyena of the SVC from 2005 to 2015.

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

ZIMBABWE

No. of Days	Description of Safari	US$
5 day	Non-trophy Buffalo Package (Below 34" and Non-exportable)	$8,500 Package
5 day	Non-trophy Buffalo Package (Below 34" and Exportable)	$9,500 Package
7 day	Plains game Mokore	1x1 - $550/Day
7 day	Plains game Mokore(2 Clients per 1 Pro-Hunter)	2x1 - 500 each/Day
7 day	Plains game Mokore Bowhunt	1x1 - $500/Day
7 day	Plains game Mokore Bowhunt (2 Clients per 1 Pro-Hunter)	2x1 - $450 each/Day
7 day	Plains game Mokore Bowhunt (3 Clients per Pro-hunter)	3x1 - $400 each/Day
7 day	Plains game Sengwa	1x1 - $750/Day
7 day	Plains game Sengwa (2 Clients per 1 Pro-Hunter)	2x1 - 700 each/Day
7 day	Non-trophy Elephant (Cow, Non-exportable)	$12,000 Package
7 day	Hippo/Crocodile	1x1 - $1,300/Day
10 day	Sable/Plains game	1x1 - $1,000/Day
10 day	Tuskless Elephant/Plains game	1x1 - $1,000/Day
12 day	Tuskless Elephant/Buffalo/Plains game	1x1 - $1,300/Day
10 day	Buffalo/Plains game	1x1 - $1,300/Day
10 day	Buffalo/Plains game (2 clients per Pro-Hunter)	2x1 - $1,250 each/Day
15 day	Leopard/Plains game	1x1 - $1,500/Day
15 day	Buffalo/Sable/Plains game	1x1 - $1,300/Day
15 day	Buffalo/Leopard/Plains game	1x1 - $1,750/Day
18 day	Buffalo/Leopard/Sable/Plains game	1x1 - $1,750/Day
12 day	Elephant/Plains game Mokore	1x1 - $ 1,500/Day
12 day	Elephant/Plains game Sengwa	1x1 - $1,000/Day
15 day	Elephant/Buffalo/Plains game	1x1 - $1,500/Day
21 day	Lion/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - $2,500/Day
28 day	Lion/Elephant/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - $2,500/Day

Observer Fees - US$250 per person per day

CITES permits for elephant, leopard and crocodile: $150 each

Pre-baiting for cat or crocodile hunts: $300 per day + bait trophy fees

Vehicle Transfers - $500 one way/vehicle

Conservation Levy - $20/person/day

4% Gov levy on total daily rates and trophy fees

All Cat or Elephant hunts on Private Land now need a Parks Ranger - $100/day that he is needed

TROPHY FEES

	US$		US$
Elephant Bull - Mokore	15,000.00	Zebra Bait (Mokore only)	500.00
Lion	15,000.00	Bushpig	500.00
Elephant Bull - Sengwa	12,500.00	Warthog	500.00
Leopard	7,500.00	Caracal	500.00
Sable	5,000.00	Antbear	450.00
Hippo	5,000.00	Honey Badger	450.00
Buffalo	5,000.00	Grysbok	375.00
Crocodile	4,500.00	Serval	350.00
Tuskless Elephant	4,000.00	Civet	300.00
Nyala	4,000.00	Duiker	290.00
***Waterbuck	2,400.00	Jackal	275.00
Buffalo Cow	2,000.00	Impala males	250.00
Eland	1,950.00	Genet	225.00

ANOTHER FINE EXAMPLE OF CONSERVATION THROUGH SUSTAINABLE AND ETHICAL HUNTING.

Prior to 2002, Coutada 9, like all other wilderness areas in Mozambique, had been through over 25 years of civil war and rampant poaching. This massive area (4333 square kilometres) was left virtually devoid of wildlife. Furthermore, the area suffered serious habitat destruction, being subjected to annual late season bushfires and the indiscriminate cutting of trees through "slash and burn" agricultural practices. In 2002, Rio Save Safaris, took over the concession and set out to re-habilitate the area to its former glory. Firstly, they needed to take control of the massive poaching epidemic and provide surface water for the very limited remaining wildlife.

Over the past 13 years RSS has drilled 22 boreholes and constructed 12 large dams, these provide permanent surface water for the wildlife in Coutada 9. This water is essential for life and all species benefit, including birds, smaller mammals as well as insects. The construction of these dams has been a lengthy and expensive exercise.

Some of the completed dams on Coutada 9 creating permanent surface water for the wildlife.

Since 2003 RSS anti-poaching teams have consistently removed over 1000 gin traps per year, caught on average 150 poacher per year and confiscated numerous homemade muzzle loader rifles as well as a few modern assault weapons like AK 47's from poachers. For EVERY weapon confiscated, poacher apprehended or trap removed RSS have paid an incentive bonus to the anti-poaching units. Due to these continuous efforts, the wildlife has thrived and flourished, to the stage where most populations have reached sustainable population densities.

A year's haul of traps and guns with some of RSS anti-poaching game scouts.

An elephant bull poisoned by villagers where nothing from the animal was utilised and one of the 150 poachers arrested annually by RSS anti-poaching units with his traps. Most poaching is done for commercial use and totally unsustainable.

Some species populations, however were so low that RSS set out to re-introduce these species. Not a small feat in itself considering no importation of wildlife or inter-area game transfers had ever taken place in Mozambique.

After 18 months of tireless negotiations, RSS imported 10 lions in September 2009 from Phinda Game Reserve in South Africa. They were transported and successfully released them into Coutada 9 over 1600 km away. They have settled and are breeding well in the coutada.

Waterbuck numbers, a species that once thrived in Coutada 9, were down to a mere handful after the civil war. RSS made a deal with Gorongosa National Park to swop 20 Zebra and 40 eland for 146 waterbuck. GNP got to increase their eland and zebra populations and C9 received 146 waterbuck in September 2013. Waterbuck are now seen daily and breeding well.

Eland from Coutada 9 being released into Gorongosa National Park and the replacement Waterbuck into C9.

Waterbuck and eland successfully released .

A key priority from the outset, was to boost the local remnant buffalo population and after more than 10 years of trying to source buffalo from surrounding countries as well as within Mozambique. RSS was FINALLY granted permission from the Mozambique government to capture 50 buffalo as a trial from the Zambesi Delta reserve. This was finally achieved in 2015. The 50 buffalo are safe and sound in Coutada 9 with plans now to capture a further 250 next year.

The first 50 buffalo in their quarantine bomas, November 2015.

These projects and all other developments such as building of road networks, Safari Camps and staff accommodation to date have been funded through trophy hunting. RSS operates on a strict sustainable offtake quota where a small percentage, normally 2-5% of a population, is harvested. These animals are usually males past their prime and their removal has little impact on the overall species population.

All funds raised through trophy hunting to date, have gone back into the conservation and development of this magnificent area as well as to support the local communities. Unfortunately due to the remoteness of the concession and thick bush, photographic tourism is very limited and not a feasible option for this area.

RSS employ 50 game scouts for anti-poaching alone as well as another 60 plus people for all other development work required. This in turn provides over 100 families with a reliable source of income and food annually.

Of the animals harvested 25 % of the trophy fee received from foreign hunters goes directly to the local communities. RSS also supplies most meat to the community either directly through delivering it to the local villages or indirectly through issuing it to the staff working within the Coutada. The meat from ALL animals harvested is FULLY utilised, including lions, baboons and especially elephant.

RSS has also built a school, clinic and drilled boreholes for the surrounding communities. Many of our hunting clients have made donations to the school personally or in the form of delivering SCI Blue Bags.

Poaching, as opposed to legal trophy hunting, is indiscriminate, without regard to age, sex or species of animals killed. There is no respect for boundaries or numbers of animals harvested and if not constantly policed there WILL be no wildlife left. The general modus operandi of the poachers in this region is hunting with homemade gin traps or snares which is very cruel. When RSS initially arrived in Coutada 9 almost every animal harvested by hunters was missing a foot from these traps.

Basically, the animal once trapped will drag the trap around for 3 -4 days until the poachers catch up to it and kill it with an axe or spear. Some species such as lion, buffalo, leopard and elephant that they cannot kill due to the danger aspect with their axes are left to drag these traps around for weeks until the animal dies either from starvation or from infection. Sometimes the animal's foot rots, breaks or is bitten off. These survivors are then crippled for life, or slowly lose condition and die.

One male lion had three of its four limbs injured from traps. Thanks to hunter supported anti-poaching efforts there are far fewer cases of injured animals but still a massive and continual problem.

An eland with a trap on that escaped the poachers with two axes embedded in it and a baby elephant that had to be put down after dragging this trap for over a week.

A buffalo cow that was caught in a trap that was put down after a week and one of several elephant poached annually for their ivory.

A mature lioness and a sub adult lioness that both died from these traps.

A young male lion that was caught with a trap, after a week it's foot rotted off and is now walking around with only 3 feet.

The illegal cutting of hardwoods for planking is another massive problem and the RSS anti-poaching team is heavily involved in trying to protect all the beautiful hardwoods on Coutada 9.

The only donations received to date have been from the hunting organisations, Dallas Safari Club and Safari Club International. RSS would like to thank them both for helping us save the animals and habitat on Coutada 9.

A massive THANK YOU to all the hunters who in following their passion for adventure in wild Africa. Have saved thousands of animals in Coutada 9, provided employment and income for many families as well as fed thousands of local villagers over the past 13 years. None of the animals pictured here have names but hunters are the ONLY ones fighting to save these remote and wonderful areas and their wildlife. Your continued support of sustainable hunting is greatly appreciated.

Pictured above is 1306 gin traps, 68 cable snares, 9 can rat traps and 25 homemade muzzle loaders that were collected by our RSS anti-poaching team in 2015 alone. This anti-poaching effort alone costs RSS over US$100 000 annually, all of this comes from sustainable hunting.

Barry, Anna <anna_barry@fws.gov>

Re: [EXTERNAL] Kerr Permits - Status Request

Management Authority, FWHQ <managementauthority@fws.gov> Mon, Aug 20, 2018 at 3:16 PM
To: Conroe Taxidermy <info@conroetaxidermy.com>
Bcc: anna_barry@fws.gov

Thank you for your inquiry.

Permit applications 84787C, 95176C, and 60944C are all under review. Please keep in mind that:

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service has revised its procedure for assessing applications to import certain hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries. In their place, the Service is making findings for trophy imports on an application-by-application basis. Click here for the memo.

Permit 60943C was issued on 1/26/2018

****

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Tue, Aug 14, 2018 at 3:32 PM, Conroe Taxidermy <info@conroetaxidermy.com> wrote:

> Please advise the status of the following:
>
> Acknowledgement letter for Permit No. "84787C"" Lion
>
> Acknowledgement letter for Permit No. "95176C"" Leopard
>
> Acknowledgement letter for Permit No. "60943C"" either Leopard or Elephant (letter did not specify animal)
>
> Acknowledgement letter for Permit No. "60944C"" either Leopard or Elephant (Leopard Permit was issued)

Please note our new email address – info@conroetaxidermy.com

Conroe Taxidermy

11845 Clark Lane

Conroe, TX 77385

(281) 367-2745

www.conroetaxidermy.com

Please follow us on social media. Click on the links below.

"Having actually hunted the animal helps us create a better mount. We are known around the world because of our quality and for creating works of art to last a lifetime." -Mike Simpson

[EXTERNAL] Supplement to all outstanding Zimbabwe Lion Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Wed 6/3/2020 5:01 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (131 KB)

SupplementalLettertoUSFWS.zimbabweLions.docx; CAMPFIRE_Zimbabwe_Concerns on Import Bans.doc.pdf;

Ms. Brisendine,

Please see the attached letter and document to be included with all applications listed, which should be all outstanding lion import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Lion** import permit applications for applicants listed below – all in Zimbabwe

Charles Baker	09644C
Jeffrey Campagna	78386C
Paul Cater	78387C
Frank Cavalo	16345D
Todd Fry	08061D
Phillip Glass	94865B
Phillip Glass	11954D
Kent Greenawalt	86471B
Timothy Haley	94867B
Clarence Hildebrandt	70878D
Eric Jande	78392C
Harris Junell	51290D
Eubulus Johnson	84787C
Brandon Morris	01264D
Cooper Ribmann	94870B
Keith Riggs	75286C
Gary shores	95149C
Frank Sprow	52895D
Jullian Sullivan	82928C
Chris Taylor	50280C
Thomas Whaley	11229C
Thomas Whaley	50280C
Thomas Zulim	30345C

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for lions in Zimbabwe that further detail the populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

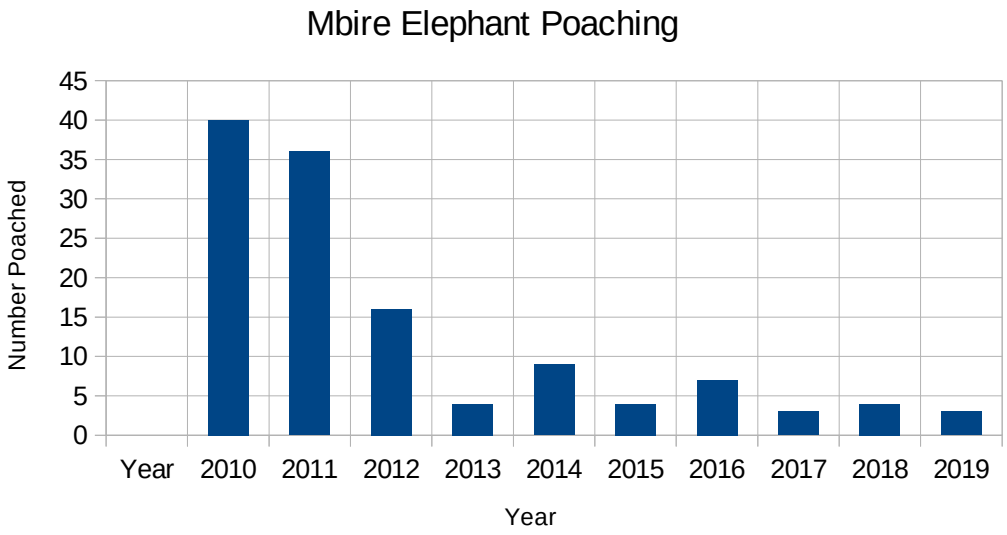

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

Re: Proof of Enhancement for trophy import permitting

Dear Operator:

The FWS has added a requirement that enhancement and non-detriment findings be proven case by case. Conservation Force has always helped with import permits to open areas or add new game species. Now we have enlarged our program to assist you and your clients in successfully applying for USFWS trophy import permits for select species. To prove enhancement, we need your help.

As announced in March 2018, the USFWS has withdrawn and is no longer making countrywide enhancement (ESA) and non-detriment (CITES) findings. It must now make findings on an application-by-application basis. This means the USFWS must find that the particular hunt and operator benefits the species hunted.

The USFWS has previously found that habitat protection and restoration, control of poaching (to protect the hunted species or its prey), and community participation to reduce conflict and increase stewardship are important indicators of enhancement upon which to base issuance of permits.

The attached questionnaire, which is in Word table format, asks about this kind of enhancement generated by hunting in your area. We request that you complete this Operator Enhancement Questionnaire as best you can to enable your client to obtain an import permit. It is useful to attach supporting documents (e.g., it can be very effective to attach your annual report to the wildlife authority or an anti-poaching log if available). The more information that demonstrates benefits and active management the better. We will not share this specific information with anyone but the USFWS. However, we request your permission to use this information aggregated with other operators to describe the real benefits of safari hunting.

We also ask that you forward any applicable hunting licenses or permits for your client to us when returning this completed questionnaire.

Please let us know if you have questions.

Kindest regards,

John J. Jackson III
Conservation Force
Chairman

Operator Enhancement Questionnaire

1. Operator Information

a.	Name of Area Operator:	
b.	Years in business:	10
c.	Name of Company conducting hunt:	MARTIN PIETERSE SAFARIS
d.	Closest town to hunt location:	VICTORIA FALLS
e.	Country where hunt will take place:	ZIMBABWE

2. Concession MATETSI UNIT 1

e.	Can it be renewed?	(Yes)	No
f.	Length of Renewal, if applicable:	10 YEARS	
g.	Estimated total amount received in trophy fees last year, if applicable:	± $100 000	
h.	Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:		
	ANTI-POACHING, FIRE PREVENTION, WATER SUPPLY, COMMUNITY EDUCATION		
i.	Please provide the Concession location and nearest City:	MATLAND NORTH, VICTORIA FALLS	
j.	Please attach a map or maps with the boundaries marked and showing the nearest City		
k.	If the Concession borders a National Park, please provide Park name:	HWANGE NAT PARK	
l.	Description of general and distinctive habitat features and any water features:		
	ROLLING HILLS, LIVELINE, THICK MOPANE, SPRINGS,		
	TEAK WOODLAND, OPEN GRASSLAND		

3. COMMUNITIES IN THE CONCESSION

a.	Are there any communities living in the Concession?	Yes	No
b.	If so, estimated number of people or villages in the Concession?		
c.	Are there communities bordering this Concession?	Yes	No
d.	If so, estimated number of people or Villages around the Concession?		

4. RELEVANT GAME POPULATIONS IN THE CONCESSION:

ELEPHANT	✓		✓	
LION	✓	✓	✓	✓
LEOPARD	✓		✓	
PREY SPECIES	✓		✓	

5. LOCAL COMMUNITY PARTICIPATION

a.	Total employment number:	18
b.	Please identify the number and type of all employees:	18, CHEF, WAITER, GENERAL, SKINNER, TRACKER, ANTI-POACHING STAFF.

PROFESSIONAL HUNTERS	2	1
TRACKERS	4 5	3
ANTI-POACHING SCOUTS/RANGERS		4
OTHER ANTI-POACHING	RANGERS FROM PARKS (ARMED)	
COOKS/HOUSEKEEPERS	2	2
COMMUNITY COORDINATORS	1	—
MANAGERS	1	—
BIOLOGISTS	1	1
OTHERS:	ECOLOGIST THROUGH NATIONAL PARKS.	

c. Number of staff employed in the off-season:

a. Please identify the number and type of staff that are engaged when the season is not open:

[redacted]

OTHERS: N/A.

7. ANTI-POACHING EFFORTS:

a. Number of Anti-Poaching staff: 5
b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both? BOTH
Hunting season: ✓ Off-season: Both seasons:
c. Months during which Anti-Poaching Patrols are conducted: ALL YEAR
d. Number of Anti-Poaching Patrols per month: ALWAYS OUT ON PATROL
e. Description of Anti-Poaching equipment, vehicles, etc.: LAND CRUISER X2, RADIOS, TENTS, WEAPONS,

7. ANTI-POACHING EFFORTS: [CONTINUATION]

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? NATIONAL PARKS.

g. Do you offer rewards to poaching informants leading to arrest? Yes ~~No~~
h. Do you offer rewards to poaching informants upon conviction? Yes ~~No~~
i. Please describe the company's anti-poaching expenditures below:

[illegible]	[illegible] 2017	[illegible] 2018	[illegible] 2019
SALARIES FOR ANTI-POACHING SCOUTS	12K	12K	
EQUIPMENT	2K		
VEHICLES	10K	10K	
PETROL	2K		
REWARDS PAID	1K		
OTHER:			
OTHER:			
TOTALS	$27 000 (2017).		

j. What currency are the expenditures given in? USD $

8. ANTI-POACHING RESULTS:

[illegible]	[illegible] 2017	[illegible] 2018	[illegible] 2019
POACHING INCIDENTS DISCOVERED	2	2	—
ELEPHANT CARCASSES OBSERVED	1	—	—
LION CARCASSES OBSERVED	—	—	—
LEOPARD CARCASSES OBSERVED	—	—	—
IVORY POACHERS ARRESTED	—	—	—
MEAT POACHERS ARRESTED	4	—	—
OTHER POACHERS ARRESTED	—	—	—
POACHERS CONVICTED	—	—	—
SNARES/GIN TRAPS COLLECTED	—	—	—
FIREARMS CONFISCATED	—	—	—
VEHICLES CONFISCATED	—	—	—
BICYCLES CONFISCATED	—	—	—
BOATS/NETS CONFISCATED	—	—	—
TUSKS RECOVERED	—	—	—
OTHER:	N/A		

b. If so, what percentage or amount is shared, how often, and why (e.g.: required by law, required by contract, voluntary contribution)? VOLUNTARY – 50% OF MEAT, EMPLOYMENT OPPS.

c. Does the Company provide game meat to nearby communities? YES ~~YES~~

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 50% OF ANNUAL OFFTAKE - DISTRIBUTED TO LOCAL COMMUNITIES THROUGH A SYSTEM.

e. If the Company performs problem animal activities for surrounding communities (e.g.: patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.

f. Please describe any consolation payments made to local residents damaged by game species N/A AS WE DO NOT HAVE COMMUNITIES CLOSE TO THE AREA.

g. What currency are the expenditures reported in? N/A

Species	Consolation Paid 2017	Consolation Paid 2018	Consolation Paid 2019
Elephant			
Lion			
Leopard			
Other			

N/A.

a. Please describe any community projects paid for by the Company: [Use separate sheet]

b. What currency are the expenditures reported in?

Type of Project	Spending 2017	Spending 2018	Spending 2019	Remarks
Education (e.g.: Classrooms, Offices)				
Education (e.g.: School Fees, School Supplies)				
Health (e.g.: Clinics, Offices)				
Health (e.g.: Medical Salaries, Equipment)				
Community Scout Salaries				
Other Community Anti-Poaching				

N/A AS WE DO NOT HAVE COMMUNITIES IN OR CLOSE TO THE HUNTING AREA AND NATIONAL PARK.

9. Community Investment: [Continuation]

Type of Project	Spending 2017	Spending 2018	Spending 2019	Remarks
Local Government Activities				
Water Infrastructure Improvements				
Sports Teams Funded				
Construction Materials Donated				
Other:				
Other:				
TOTALS				

N/A AS WE DO NOT HAVE COMMUNITIES IN OR NEAR THE HUNTING AREA AN NATIONAL PARK.

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	2015: /	2015:	2015:	—	2015:		—
	2019: /	2019:	2019:	3	2019:		14
PERCENTAGE OF U.S. CLIENTS	2017: /	2017:	2017:	2	2017:		12
	2018:	2018:	2018:		2018:		
	2019:	2019:	2019:		2019:		
TROPHY FEES PAID BY U.S. CLIENTS	2017:	2017:	2017:		2017:		
	2018:	2018:	2018:		2018:		
	2019:	2019:	2019:		2019:		

± $75 000 ANNUALLY IN TROPHY FEES

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: 60%

12. OTHER INFORMATION: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g.: aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.
[USE SEPARATE SHEET]

- BOREHOLES DRILLING
- FIRE PREVENTION
- GAME COUNTS
- SOLAR INSTALLATION
- AGING OF ALL SPECIES.
- ONLY MATURE MALES OF ANY SPECIES ARE HUNTED.

13. I declare that the foregoing is true and correct:

	TELEPHONE:	+263 778121842
CONCESSION NAME	EMAIL:	martinpietersafaris@gmail.com
MAFETSI UNIT 1		
OPERATOR – FULL NAME (PLEASE PRINT)		TITLE
MARTIN PIETERS SAFARIS		MR
SIGNATURE		OPERATOR WEBSITE

www.martinpietersafaris.com

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed Lion Trophy from Zimbabwe.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.c

(b) (6)

Eloy J. Kem III
PRINT FULL NAME

7/1/2020.
DATE

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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SHANE MAHONEY
RENEE SNIDER

July 15th, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine – Zimbabwe and Namibia
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: Amy_Brisendine@fws.gov

RE: PRT # 84787C, Applicant Dr. Euby Kerr, Lion from Zimbabwe
Supplement to the Import Permit Application

Ms. Brisendine:

This is a supplement to the existing application, PRT # 84787C for Dr. Euby Kerr for his lion from Zimbabwe.

Answers to Questions of the import permit application-originally left unanswered or information changed:

6a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or huntingblock, AND nearest city) where wildlife was removed from the wild:

Hunting concession: Matetsi Unit 1; Region: Matabeleland north; Closest City: Victoria Falls
GPS: 983245

6b. Date wildlife was hunted:

May 10, 2018

6c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Martin Pieters- P.H. and with Martin Pieters Safari

6d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Consultants International (Formerly Taxidermy Enterprises (Pvt) Ltd.)– 4 Josiah Chinamano Road, Belmont, Bulawayo, Zimbabwe
clientliaison@tci.co.za

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

Permits and licenses are not issued in Matetsi, they have an annual quota and they adhere to that.

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

9a. Do you have any information regarding the population status or trend data on the species hunted?

Please reference the Republic of Zimbabwe Enhancement and Non-Detrimental findings for Panthera Leo in Zimbabwe that we have included. In that document you will find on page 412 a description of the Matetsi Safari area and lion trends and population statistics for that area. It states in this document that areas like these in Zimbabwe have seen elephant populations increase.

9b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Trophy fees for a lion in the Matetsi area are $30,000.00 U.S. dollars, much of this goes towards Concession improvements like drilling boreholes, fire prevention, solar installation, and keeping game counts.

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please reference the operator enhancement report provided for the Matetsi Unit 1 area, where this hunt took place.

Please refer to these documents and the hundreds of pages of information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by the government authorities in Zimbabwe, outfitters, and others, in making a positive enhancement finding and issuing an import permit for this lion trophy.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver

Aimee Korver
Permits Paralegal Conservation Force

Cc: Dr. Euby Kerr w/attachments

Enclosures:
a. Notice of Representation
b. Operator enhancement report – Matetsi Unit 1
c. Enhancement and Non-Detrimental Findings for Panthera Leo in Zimbabwe
d. This letter with supplemental answers for the application # 84787C

Republic of Zimbabwe

Enhancement and Non-Detrimental Findings for

Panthera leo in Zimbabwe

Zimbabwe Parks and Wildlife Management Authority

October 2016

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1 INTRODUCTION

The United States Fish and Wildlife Service (USFWLS) made a ruling in terms of its Endangered Species Act of 1973 (ESA) that the status of the southern and eastern African lion subspecies (*Panthera leo melanochaita*) is threatened (see http://www.regulations.gov). This ruling, which came into effect on January 22, 2016, now requires that the importation of all trophy lion from Zimbabwe will require an import permit. The decision whether to issue an import permit will in future be based on a Non-Detrimental Finding (NDF) that takes into consideration four main factors outlined under 50 CFR 17.22 and 17.32. These are:

- What direct and indirect impacts would occur on the wild population?
- Would issuing a permit conflict with any known programs intended to conserve the species?
- Would the purposes of the permit reduce the threat of extinction facing the species?
- What are the opinions of experts?

In addition to these factors USFWLS will also take into consideration the IUCN Species Survival Commission (SSC) *Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN/SSC 2012). This document identifies five guiding principles of a hunting program that creates "*incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources*" and recognizes that trophy hunting can contribute to biodiversity conservation and the conservation of the hunted species.

These are:

- **Biological sustainability** i.e. the hunting program:
  - Cannot contribute to the long-term decline of the hunted species
  - It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat
  - It should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities
  - It should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

- **Net Conservation Benefit** i.e. the biologically sustainable hunting program should be:
  - Based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed
  - It should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species
  - It should create benefits for local residents to co-exist with the target species and other species

- **Socio-Economic-Cultural Benefit** i.e. a well-managed hunting program can serve as a conservation tool when:
  - It respects the local cultural values and practices
  - It involves and benefits residents in an equitable manner
  - It adopts business practices that promote long-term economic sustainability

- **Adaptive Management: Planning, Monitoring, and Reporting** i.e. can the hunting programme enhance the species when it is based on appropriate resource assessments and monitoring (e.g., population counts, trend data), upon which specific science-based quotas can be established. Resource assessments should be objective, well documented, and use

the best science available. Adaptive management of quotas, based on the results of resource assessments and monitoring, is essential

- **Accountable and Effective Governance** i.e. a biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries, and take steps when needed to eliminate corruption and ensure compliance with national and international requirements and regulations.

To address the points raised above, a systematic review of the status of lion in Zimbabwe has been undertaken with the full cooperation of stakeholders from the Government, Private Hunting Sector, Community NGOs and research organisations to demonstrate that the lion populations in Zimbabwe are being managed sustainably for benefit of both the conservation of the species and that the management programme is also providing economic incentives for local communities to protect and expand lion habitats. In doing so this assessment addresses the following issues:

- That the Zimbabwe hunting industry is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (where feasible) and ensuring adequate protection from human encroachment.
- Demonstrate that there are government incentives in place to encourage habitat protection by private landowners and communities and incentives to local communities to reduce human-wildlife conflicts.
- Demonstrate that hunting concessions are managed to ensure the long-term survival of the listed species and its habitat.
- That trophy hunting provides financial assistance to the Zimbabwe Parks and Wildlife Management Authority, including the communal CAMPFIRE programme and private sector, to carry out various wildlife management programmes. It will also highlight how local communities directly and indirectly benefit from the presence of lion in their areas.
- Finally, this document will demonstrate how the participation of U.S. hunters in the Zimbabwe hunting industry contribute to the overall management of lion within the country.

2 Status and Distribution of Lion in Zimbabwe

Bauer et al (2015) summarise time series data for 47 lion populations across West, Central, East and Southern Africa where regular survey data are available. Using a Bayesian state space model to estimate growth rate-λ for each population, this study concludes that lion populations are declining everywhere across Africa, except in four southern countries (Botswana, Namibia, South Africa, and Zimbabwe). The population models indicate a 67% chance that lions in West and Central Africa will decline by one half, while estimating a 37% chance that lions in East Africa will also decline by one-half over two decades. It is concluded that almost all lion populations that historically exceeded ~500 individuals are declining, *but lion conservation is successful in southern Africa, in part because of the proliferation of reintroduced lions in small, fenced, intensively managed, and funded reserves.* This statement reflects the situation in Zimbabwe where lion populations in the conservancies have flourished under sound management regimes. They have also recovered rapidly in instances where appropriate actions have been taken to arrest unsustainable practices (i.e. Hwange) and where protected areas are receiving adequate funding (i.e. Gonarezhou).

2.1 The extent of lion distribution in Zimbabwe

The Zimbabwe Parks and Wildlife Management Authority (ZPWMA) is responsible for managing one of the largest estates in the country which constitutes approximately 5 million hectares of land or 13%

of the Zimbabwe's total land area (see Table 1 below). The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country, among other wildlife tourism related activities (Parks and Wildlife Act 2001 Chapter 20:14).

Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use (Figure 1). Table 1 below provides a summary of these different categories, and whether they support lion populations (see Annex 1 for the details of each area).

Table 1. Summary of the National Parks Estate, CAMPFIRE, Forestry and Conservancies where lion populations are resident

Land Category		Presence of Lion				Total (ha)	Total (km^2)
		Yes (ha)	%	No (Ha)	Migratory (Ha)		
Parks Estate	National Parks	2,608,710	96	61,850	47,150	2,717,710	27,177
	Safari Area	1,745,300	92	146,600	-	1,891,900	18,919
	Botanical gardens	-	-	2,069	-	2,069	21
	Sanctuary	-	-	18,980	-	18,980	190
	Recreational	-	-	357,161	-	357,161	3,572
Forestry		436,165	47	491,701	-	927,866	9,279
CAMPFIRE		8,953,700	36	5,435,100	10,319,000	24,707,800	247,078
Private Conservancies		758,200	66	243,500	150,897	1,152,597	11,526
Matetsi Farms		-	-	-	155,627	155,627	1,556
Total Ha		**14,502,075**		**6,756,961**	**10,672,674**	**31,931,710**	**319,317**
Total km^2		**145,021**		**67,570**	**106,727**	**319,317**	
Percentage		**45%**		**21%**	**33%**		

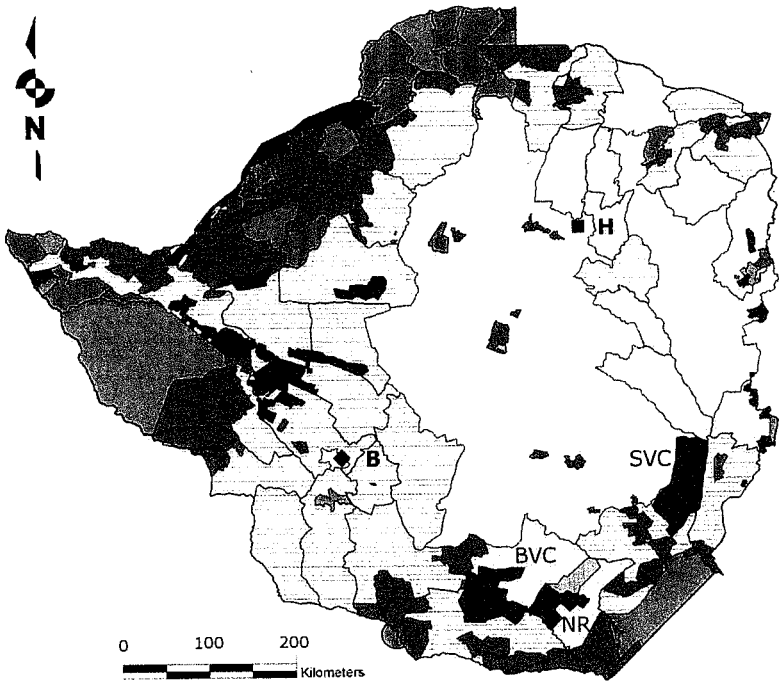


Figure 1: Map of Zimbabwe's main wildlife areas: [i] National Parks are represented in light blue; [ii] Safari areas are represented in orange; [iii] Forestry areas are represented in dark green; [iv] Community and Private wildlife areas are represented in light green; [v] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [vi] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [vii] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [viii] The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [ix] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: ii, iii, iv, v, vii & viii (from du Preez, B. Groom, R., Mufute, O., Mandisodza-Chikerema, R. and Booth, V. (2016).

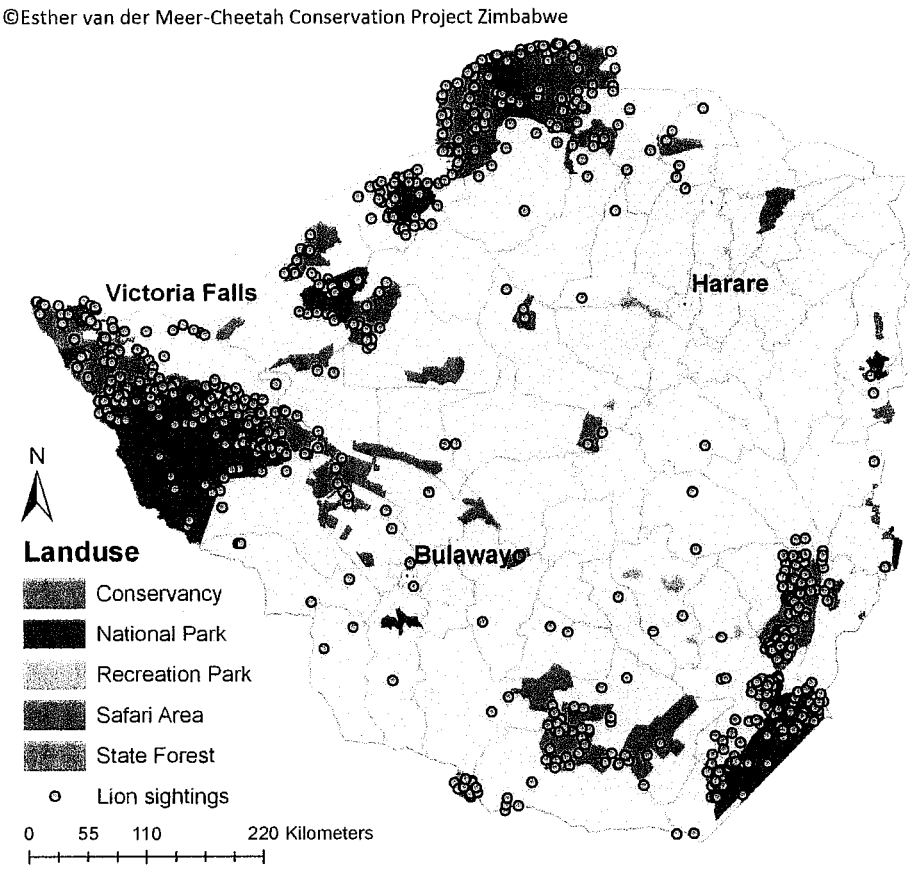


Figure 2: Range of African Lion Distribution in Zimbabwe

There are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lion occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in State protected national parks (96%) and safari areas (92%). Lion also occur permanently in 47% of the State forest areas and 66% of privately owned Conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lion occur in 36% of these areas. Lion are transient in CAMPFIRE, Conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa and Botswana (Figure 2).

There are two established Transfrontier Conservation Areas (TFCAs), the Great Limpopo Transfrontier Park (GLTP) which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Other TFCAs that are at various stages of development are the Kavango-Zambezi (KAZA), Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa) and Chimanimani.

2.2 Minimum population of lion in Zimbabwe

The minimum number lion that occur in approximately 51,642km^2 of land where reliable survey data are available is estimated to be c.1,917 (range 1,800 – 2,000) and is summarised in Table 2. The Western sector of the country dominated by Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies supports c.737 lion (or 38% of the overall population). The Southern sector dominated by the two major conservancies (Save and Bubye) and

Gonarezhou National Park supports c. 896 lions (48%) while the Central and Northern sectors of the country support c.284 lions (15%).

Table 2: Estimated minimum population of Wild Lion populations in Zimbabwe – September 2016 (Data compiled from a variety of reports)

REGION	AREA	AREA (km^2)	Estimated Number of Lions	Percentage
Western	Hwange NP	14,900	559	38%
	Matetsi Units 1-5	1,934	59	
	Matetsi Units 6-7 and Zambezi NP	1,585	67	
	Kazuma Pan NP	313	20	
	Kazuma Forest	240		
	Panda Masuie Forest	355		
	Matetsi ECA	1,556	15	
	Ngamo and Sikumi Forest	1,386	6	
	Gwaai Conservancy	927	22	
	Hwange Communal Land	392	2	
	Tsholotsho buffer adjacent HNP	1,275	7	
Subtotal		**24,863**	**737**	
Central	Chizarira NP	1,948	31	4%
	Chirisa SA	1,713		
	Omay	1,865	10	
	Matusadona NP	1,427	31	
Subtotal		**6,953**	**72**	
Northern	Chewore North and South	1,648	45	11%
	Dande	1,155	21	
	Hurungwe (Nyakasanga and Rifa)	1,709	32	
	Charara/Mukuti	1,692	20	
	Mana Pools	1,287	94	
Subtotal		**7,491**	**212**	
Southern	Gonarezhou National Park	5,053	125	48%
	Malilangwe	400	37	
	Bubye Valley Conservancy	3,440	450	
	Save	3,442	284	
Subtotal		**12,335**	**896**	
Overall Total		**51,642**	**1,917**	

2.2.1 Captive Breeding Facilities

Currently there are only two properties registered as captive lion breeders (Lion and Cheetah Park, and Antelope Park) and < 10 non-registered captive lion breeding operations (Table 3). Most of these centres keep lions for non-consumptive tourism and environmental education purposes with only a few keeping lions as pets. Altogether there are 345 lions held in captivity.

Table 3: Record of lions held in captivity – September 2016

Property	TOTAL
Doddieburn	13
Lion & Cheetah Park	40
Sentinel	2
Vhuka	5
Antelope Park	114
Safari Par, Masuwi Lodge (Lion Encounter)	4
Mhondoro Game Park	2
Chedgelow Farm	9
Chengeta	5
Turk Mine	6
Bally Vaughan	8
Mwanga Lodge	8
Masvingo	17
Karoi	2
Oscro	10
Simply Wild	19
Sondelani	9
Ruwazi	7
Imire	2
Makado Ranch	2
Chipangali	32
Crocodile Farm, Victoria Falls	1
Kuimba Shiri	2
Pamuzinda	6
Shearwater	10
Inyathi Ecogame Park	10
Total	**345**

3 Conservation and Management

3.1 Policy And Legislation

The Ministry of Environment, Water and Climate has a comprehensive suite of policies and legislation that provides the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) with a mandate to conserve and protect all fauna and flora in the country.

The legal framework is enshrined in the National Legislation and associated Regulations that are informed by the Wildlife Policy (1992) that seeks to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. Amongst others it seeks to create

economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

The ZPWMA is established by the Parks and Wildlife Act of 1996 (Chapter 20:14) as amended by Act Number 19 of 2001 which came into operation on the 1st of June 2002 through a Statutory Instrument 144C of 2002. The Act provides for the:

- Establishment of a Parks and Wildlife Board;
- Confers functions and imposes duties on the Board;
- Establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks;
- The preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery;
- Conferment of privileges on owners and occupiers of alienated land as custodians of wildlife, fish and plants;
- Giving of certain powers to environment committees (formerly intensive conservation area committees); and matters incidental to or connected with the foregoing.

The Act that was originally passed by Parliament in 1975 was unique in that it provided a legal basis for the devolution of Authority to private landowners over all wildlife on their land which resulted in in the rapid development of the country's wild life industry. It also paved the way for the partial extension of this principle to the Communal Lands through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) in the 1980s that granted Appropriate Authority Status to the communal areas to manage the wildlife resources for their own benefit.

The Act was subsequently revised in 1996 and 2001 with the latest revision paving the way for the establishment of the current Parks and Wild Life Management Authority to replace the former Department of National Parks and Wild Life Management.

The legal and regulation framework applicable to the conservation and protection of lion and all other species includes:

- Parks and Wildlife Act; Chapter 20:14 (1996) as amended in 2001.
- Environmental Management Act; Chapter 20:27.
- Forest Act; Chapter 19:05.
- Statutory Instrument 362 of 1990: Parks and Wildlife (General) Regulations, 1990.
- Statutory Instrument 76 of 1998: Import and Export of Wildlife Products.
- Statutory Instrument 40 of 1994: Parks and Wildlife Act (General) Amendments.
- Statutory Instrument 26 of 1998: Parks & Wildlife Act (General) Amendment.
- Statutory Instrument 92 of 2009: Compensation Values for Wildlife.
- Statutory Instrument 93 of 2009: Compensation Values for Trapping of Animals.
- Trapping of Animals Control Act 20.16.

A summary overview of these instruments is provided in Annex II.

3.2 The Zimbabwe Parks and Wildlife Management Authority

The Parks and Wildlife Management Authority is mandated by the Parks and Wildlife Act [Chapter 20:14] with the responsibility of conserving Zimbabwe's wildlife heritage through effective, efficient and sustainable protection and utilisation of natural resources for the benefit of present and future generations. The Authority was established to allow it to retain the revenue that it generates for

funding its operations and thereby reducing its dependence on Treasury. This entailed introducing a commercial dispensation and putting in place effective revenue generation and financial management systems.

The ZPWMA has the mandate to manage the entire wildlife population of Zimbabwe, whether on state, private and communal land. Vision, mission and core values of ZPWMA are as follows:

Vision: *To be the world leader in sustainable conservation.*

Mission: *To conserve Zimbabwe's wildlife heritage through effective, efficient and sustainable utilisation of natural resources for the benefit of present and future generations and stakeholders*

Core Values: Teamwork, Commitment, Transparency, Professionalism, Integrity, Accountability, Fairness, in harmony with nature.

While private landowners may utilise the wildlife on their land, they are still accountable to the ZPWMA for the welfare of the wildlife in terms of Statutory Instrument 26 of 1998, which, among other things, states that *"No person shall permit any person who is not ordinarily resident in Zimbabwe to hunt on any land for which he is the appropriate authority any animals other than those entered on the authority to hunt...'*

3.3 Conservation Strategy and Action Plan for Lion

A *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* was prepared in 2006 by the ZPWMA, local and international NGOs. This was in response to the proposal submitted by Kenya at the 13th Conference of the Parties to the Convention on International Trade in Endangered Species of Flora and Fauna (CITES) calling for the transfer of the lion population from Appendix II to Appendix I. The Parties recommended a detailed examination of the issues surrounding the conservation of the African lion, through a series of regional workshops.

IUCN responded to this and together with other key stakeholders, organised the first workshop in 2005 which involved the 14 West and Central African lion range states. The second workshop brought together 15 lion range states from Eastern and Southern African in January 2006 (Bauer, Chardonnet and Nowell, 2005). Each workshop included the Directors of Wildlife Conservation Departments and their technical advisors, safari operators, community leaders, non-governmental organisations involved in conservation, as well as researchers on the African lion.

The workshops came up with several recommendations which included:

- The need for African lion range States to follow up the workshops by developing and implementing national lion management plans.
- The need for a Pan African Conservation strategy to form the basis of a region wide collaboration in the conservation of the lion and which would also form the basis for the management of other wildlife species on regional scale.

Responding to the first recommendation, the ZPWMA, together with IUCN, convened a workshop in November 2006 to develop a national lion conservation strategy and action plan for Zimbabwe attended by conservation NGOs, the private sector, and Rural District Councils (RDCs), as well as ZPWMA and IUCN (Conservation Strategy and Action plan for the Lion (*Panthera leo*) In Zimbabwe, 2006).

The deliberations of this workshop identified the following issues related to lion conservation in Zimbabwe:

- Management and research including technical advice, policy formulation and management interventions
- Capacity needs as reflected by adequate human, financial and material resources
- Mitigation of human-wildlife conflict
- Socio-economic costs and benefits of long-term lion conservation
- Communication and information dissemination for key decision makers at different levels
- Framework for captive breeding of lions
- Trade and regulations to ensure non-detriment findings related to trade in all lion related products
- Regional collaboration to strengthen bilateral and regional lion conservation strategies

The analysis of these issues led to the formulation of the conservation strategy whose vision is that *Lions (*are*) conserved and managed sustainably for their aesthetic, cultural and ecological values, and the socio-economic development of Zimbabwe*. The immediate objective of this strategy is *to secure and where possible, restore as many viable lion populations as possible in Zimbabwe whilst mitigating their negative impacts and enhancing their value for the benefit of people through sustainable use*.

Three broad targets were identified to achieve this objective:

1. Ensure the persistence of key lion populations and other important populations including those of doubtful viability;
2. Human and livestock loss reduced, and
3. Optimize wildlife conservation-related net benefits to local communities

Table 4 summaries the progress with achieving the results identified in the strategy:

Table 4: Summary of implementation progress of the 2006 lion conservation strategy.

Output 1. Lion Management - Lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders	
Target 1.1 Establish a baseline survey and monitoring programme for identified lion populations and their range inside and outside the Parks & Wildlife Estate	Baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey). Selected surveys undertaken of areas outside National Parks in conservancies and some communal land and forest areas.
Target 1.2 Maintain and strengthen capacity for lion conservation, management, monitoring and research within PWMA and amongst other key stakeholders	Carnivore research programmes undertaken by NGOs (Mana, Matusadona, Gonarezhou, Zambezi and Hwange NPs, Matetsi, Chirisa SA) and research institutions (Bubye and Save Conservancies) in various parts of the country. Personnel trained in data collection and capture, management, lion aging and analysis.
Target 1.3 Identify and implement best management standards and practice for all trophy hunted lion populations, ensuring their viability and sustainable, equitable and adaptively managed trophy quotas	Quota setting methodology reviewed and annual quotas and offtakes analysed considering population changes, trophy quality and levels of PAC over time. Trophy hunting database in place and in process of being refined to provide cost-effective system for collation, entry, analysis, reporting and feedback to key stakeholders in the wildlife industry (ZPWMA, RDCs, SOAZ, ZPHGA, conservation NGOs, Researchers etc.). System of fixed and optional quotas reviewed and age-based criteria for male trophy animals in place and functioning.
Target 1.4 Develop and implement a national lion captive breeding management policy	Policy in place (see discussion below).
Target 1.5 Develop and implement co-management frameworks for wildlife management	Collaborative national lion action plans to co-management lion populations in place for NW Matabeleland and SE Lowveld, including three conservancies (Bubye Valley, Save and Malilangwe).
Target 1.6 The geographic distribution range of the lion population expanded	Conservancies and neighbouring communities are working together to maintain existing geographic distribution of lion populations. Zimbabwe proactive in the KAZA and GLTFCA programmes.
Output 2. Lion Research - Information for effective and adaptive lion conservation management generated	
Target 2.1 Initiate targeted research on lion ecology, management and mitigation of conflict	Extensive research programmes focussing on lion ecology and biology undertaken in Hwange, Bubye, Save, Malilangwe, Matusadona, Chizarira and Chirisa. ZPWMA have cooperated with NGOs, such as Panthera, to develop cost-effective age determination methods for lions. Key threats to lion populations, with focus on human-lion conflict, snaring and poisoning, undertaken and continually monitored.
Output 3. Mitigation - Human-lion related conflicts minimized and, where possible, eliminated	

Target 3.1 Develop and establish databases on lion/human conflict	Data on Problem Animal Control (PAC) reports on lion related problems collated.
Target 3.2 Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans	Approaches to mitigate livestock losses and lion attacks on humans being tested and implemented in Hwange. Methods to mitigate lion attacks on livestock being implemented as appropriate at selected sites (e.g. Tsholotsho).
Target 3.3 Trained and properly staffed PAC Units established to conduct rapid response, restrained and precisely targeted problem animal control	PAC Units at ZPWMA field station and/or RDC levels partially established.
Target 3.4 Incidents of human-lion conflict reduced by at least 30% in 5 years while also reducing retaliatory killing	Specific awareness and education package on lion conservation and management developed and implemented in Matusadona, Hwange and Gonarezhou regions.
Output 4. Socio- Economic - The costs and benefits of long-term lion management equitably distributed	
Target 4.1 Complete an inventory of stakeholders directly affected by lion conservation	Stakeholder groups (e.g. local communities, CAMPFIRE RDC representatives, commercial safari hunting operators (SOAZ, ZPHGA), tourism operators (ZATSO) identified. Financial impacts of lion conservation and extent and magnitude of socio-economic impacts on each stakeholder group completed.
Target 4.2 Deliver appropriate training and capacity building to prioritised stakeholders	Representative stakeholder groups in some regions identified (Hwange, Matusadona, Gonarezhou). Limited training undertaken. Implement adaptive programme across four wildlife regions
Target 4.3 Agree and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years	In progress. Hwange NP Management Plan approved.
Target 4.4 Implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities)	Scale of income generated from lion conservation reviewed and use of funds to encourage protection of lion populations reach local stakeholders undertaken (see CAMPFIRE generated revenues)
Output 5. Regulations - Effective regulation of consumptive lion utilisation ensured	
Target 5.1 Implement approved policy and practice at national and local levels regarding problem animal control (PAC) of lions within 2 years	Current policy and practice regarding problem animal control of lion reviewed, at national and local levels. PAC offtakes reconciled with trophy hunting quota offtake to ensure that the overall offtake (i.e. total quota) is sustainable.
Output 6. Communication, Awareness and Information Dissemination	

Target 6.1 To carry out awareness programmes in 50% of the districts in Zimbabwe within the next three 3 years	Awareness programmes initiated at a national level, with professional hunters, communities and NGO community. Awareness campaigns being carried out by the Extension and Interpretation Unit in all the regions.
Target 6.2 Create lion conservation and management information units within one year	Databases established at some key research centres using dedicated external research programmes (e.g. WILDCRU).
Output 7. Regional and Trans-Boundary Collaboration	
Target 7.1 Undertake an inventory of national strategies for lion management	Done.
Target 7.2 Encourage the development of national lion conservation strategies where these are missing &/ or incomplete	National lion conservation strategies discussed at AWCF (meeting held under auspices of KAZA).
Target 7.3 Develop an integrated and harmonised lion management strategy for Transfrontier Conservation Areas (TFCAs)	Lion conservation strategies for SADC discussed at AWCF meeting held under auspices of KAZA.
Target 7.4 Implement lion conservation strategy and management plan	Strategy under review.

3.3.1 National Lion Captive Breeding Policy

A target of the Conservation Strategy and Action Plan for the Lion in Zimbabwe was to develop and implement a National Lion Captive Breeding Management Policy. This was achieved in 2011 when the ZPWMA met with lion breeders, keepers and animal welfare organizations to define the purpose of breeding and keeping lions; identify and discuss issues related to breeding and keeping of lions in captivity and to chart the way forward on the breeding and keeping of lions in captivity.

The objectives of the policy are to provide a national approach and minimum standards to all aspects relating to the management of captive bred lions including the role of captive bred lions upon reaching maturity and regulate the import and export of captive bred lions. The policy also defines the measures to protect the genetic integrity of indigenous lion populations. The use and welfare of captive bred lions is monitored by a captive lion inspection team.

In terms of this policy, lions that are kept in captivity for species conservation and commercial purposes are subject to the following conditions:

1. No permit for the keeping of lions in captivity will be issued before the facility has been inspected and approved by ZPWMA as a Captive Lion Holding Facility.
2. Lions may not be allowed to breed in captivity unless the holding facility is registered as a Captive Lion Breeding Centre. If a breeding permit is not issued, it is the responsibility of the owner to ensure that the animals do not breed. If breeding occurs without a permit the owner will be fined and the animals are subject to confiscation and possible destruction by ZPWMA.
3. Lions may not be captured from the wild population and kept in captivity unless the animal is orphaned or injured and is captured with the purpose of rehabilitating the animal and returning it to the wild within as short a time as possible.
4. Captive bred lions may not be released into the wild or transferred from the facility without prior permission from ZPWMA, and are subject to an approved release plan.

No lion can be transported without the necessary internal and national permits and without being micro-chipped, and all transportation of live animals must comply with CITES Resolution Conf. 10.21(Rev. CoP 14). To safeguard the integrity of the indigenous gene pool, no import permits will be issued for non-indigenous lions. Any lion that are to be transported must be issued a certificate of health by a competent veterinarian confirming that the premises of origin has been free from anthrax, panleukopenia and canine distemper for six months, and that each predator is free from diseases such as FIV, BTB or any other disease which may threaten local populations. The animal should also have been vaccinated for rabies and treated with a broad spectrum de-wormer and acaricide.

It is an offence to export lions from Zimbabwe without a ZPWMA export permit, and all export permit will only be considered if the exporting facility holds a current permit to keep captive lions. Moreover, an export permit will only be issued if the importing facility, in the country of import, conforms to regulations laid out in this policy document.

4 Population Trend Data For Key Lion Populations In Zimbabwe

Zimbabwe has in recent years taken proactive actions to enhance the conservation of lion populations both inside and outside the protected areas. These have included implementing moratoriums on hunting, reducing quotas, implementing an age-based hunting regulation and undertaking independent monitoring programmes conducted by international research institutions. Emerging from this is evidence that by implementing appropriate regulatory, management and monitoring actions, coupled with raising awareness, the lion populations respond rapidly and recover to near

former levels. The section below summarises the data from key range areas both inside and outside the National Parks Estate to substantiate this.

4.1 LION SURVEY TECHNIQUES

The population estimates of lions in Zimbabwe are determined through carnivore spoor surveys, systematic lion collaring and call-up surveys. With the strategy to maintain the wilderness values of most protected areas, there is low road penetration in the parks estates, however all suitable roads are used as transects, and in areas of suitable substrate, spoor surveys have shown to be an effective and efficient means to assess wildlife densities (Stander 1998, Fuston et al. 2001, Davidson and Romanach 2007). Patrol reports, field observations by ZPWMA rangers and other sightings by tour operators and tourists also contribute to the knowledge of the status of lions in Zimbabwe's protected areas. Similarly, the occurrence of lion in Safari Areas is recorded by resident safari operators, including those operating in CAMPFIRE areas.

4.2 RESULTS OF REGIONAL LION SURVEYS

Lion population surveys provide indices of abundance that can be used to determine spatial distribution, as well as temporal trends in population numbers. The results of the different survey methods are used to generate information for setting sustainable lion trophy hunting quotas and for population management.

4.2.1 Gonarezhou National Park

Spoor count surveys of the Gonarezhou National Park have been conducted since 2009 using the same methodology to obtain direct estimates of lion populations to compared actual lion densities with potential density estimates (Groom, 2009, Groom et. al. 2014). Table 5 below illustrates the growth of the lion population in the Park (Groom and Watermeyer, 2015).

Table 5: Population estimates of lion in the whole of Gonarezhou National Park (extrapolated from survey area) from 2009 – 2015 (Groom and Watermeyer, 2015).

2009	2010	2011	2012	2013	2014	2015
31	45	72	64	77	116	125

As with many lion populations anthropogenic factors can be key drivers of lion population dynamics, and in areas with high human impact lion numbers may be significantly lower than those predicted by prey biomass models. This was found to be the case in the Gonarezhou National Park. Groom et. al. (2014) concluded that high hunting quotas either within or around the protected area were the most likely cause of the low lion numbers, with quotas in some areas being as high as seven lions per 1,000km^2 in some years. Other factors included persecution, poisoning and problem animal control, as well as disease and competition with spotted hyaenas (*Crocuta crocuta*).

Following decisions to halt lion hunting, and reducing human-lion conflict, the lion population responded and steadily increased, reaching a density of 2.5 lions / 100km^2 in 2014 (as compared with 0.6 / 100km^2 in 2009). Relative to other populations (average over Kruger NP, Hwange NP, Selous GR and Serengeti NP = 9.6 lions / 100km^2) this is still low, suggesting the population could continue to increase further. Groom et. al. (2015) conclude that the lack of artificial water in Gonarezhou means that natural carrying capacity will be lower but based on prey biomass availability predictions of lion carrying capacity could support between 200 and 300 lions (Groom 2010). It is therefore still possible that the lion population in the park could at least double before reaching carrying capacity (especially because prey biomass is now greater than it was in 2010 – see Section 8.5 below).

4.2.2 Save Valley Conservancy

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey to assess population trends of the carnivores in the Savé Valley Conservancy (SVC) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer. The results of these surveys are provided in Table 6 showing that the lion population has increased from 40 in 2005 to 284 in 2015 (Groom and Watermeyer, 2015, du Preez et al, 2016).

Table 6: Population estimates of lion in the whole of Savé Valley Conservancy from 2005 – 2015

2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
40	50	52	76	114	143	105	130	115	182	284

The lion population has increased substantially in the last two years, and there are now an estimated 284 lions in the whole of the conservancy. This is a notable increase since the 2013 estimate of 115 lions and 2014 estimate of 182, and is perhaps a latent effect of no hunting for over several years. Of the 149 lion tracks encountered, 28% were big adult males with 53% identified as females/juveniles and 15% as young cubs (3% of tracks were unidentified). The number of lions in SVC equates to a density of 11.7 lions/100km^2. This is slightly higher than other population estimates of 9.6 lions/100km^2 (average over Kruger, Hwange, Selous and Serengeti).

4.2.3 Bubiana Valley Conservancy

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (Figure 3, du Preez et. al., 2016).

The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (~0.190 lions/km^2: du Preez et al. 2015, du Preez et al. 2016), greater than that of the Serengeti, Tanzania (0.10 lions/km^2), Selous, Tanzania (0.080 – 0.130 lions/km^2: Creel and Creel 1997), Kruger National Park, South Africa (0.096 – 0.112 lions/km^2: Mills et. al. 1995), and Hwange National Park, Zimbabwe (0.027 lions/km^2: Loveridge et. al. 2007). This equates to the largest contiguous lion population in Zimbabwe.

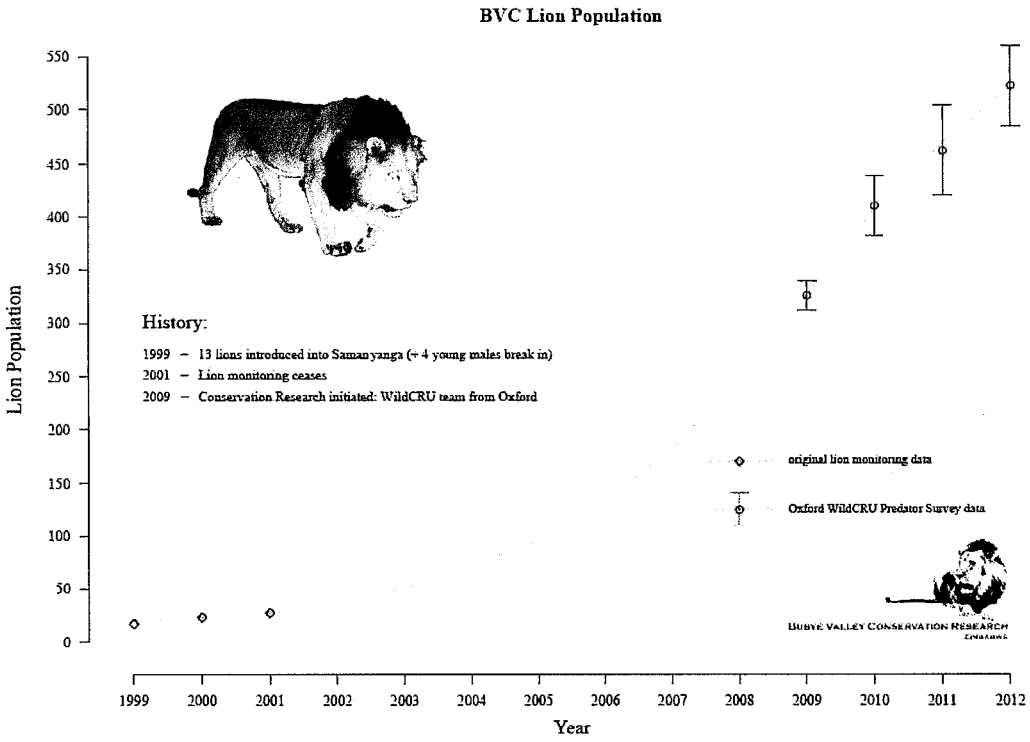


Figure 3: The Bubye Valley Conservancy lion population has increased exponentially since the original reintroduction of the species to the conservancy in 1999.

4.2.4 Mana Pools National Park

In conjunction with ZPWMA, Zambezi Society and the Cheetah Conservation Project, the Wildlife Conservation Research Unit (WILDCRU) based in Oxford (U.K.) conducted a camera trap and spoor count survey of Mana Pools National Park with the objective of:

- To undertake park wide surveys to estimate population density, distribution and habitat occupancy of common predator species in Mana Pools National Park.
- To contribute to Cheetah Conservation Project Zimbabwe's (CCPZ) cheetah monitoring protocol.
- To provide presence/absence data on all the larger mammal species.

A Facebook page was also created for the survey that was regularly updated on the progress of the survey (Facebook.com/Mana Pools Survey 2015).

The preliminary results of this survey identified 67 individual lions from the 267 images captured. When combined with the spoor count surveys, the population was estimated at 94 lions at a density of 4.5 lion/km^2 (Seymour-Smith and Loveridge, 2015),

4.2.5 Hwange National Park

The Hwange Lion Research Project undertaken by the Wildlife Conservation Research Unit (WILDCRU, Oxford University) works in association with the Zimbabwe Parks and Wildlife Management Authority. Since 1999 this project has identified over 600 lions and currently monitors approximately 15 prides and 12 male coalitions in a 5,000km^2 study area. This is one of the most intensive and long-term lion

projects in Africa. A key finding of this research programme has been to demonstrate that the way lion trophy hunting is managed can rapidly improve the status of lion populations by implementing a biologically sustainable system of allocating quotas. This project has also increase the understanding of human related impacts on lion populations (and vice-versa) along the park boundary. More recent research is focussed on understanding connectivity between Hwange NP and other areas such as parks in Botswana and in Zimbabwe.

This project was initiated because there was a perception that levels of sport hunting of male lions' in the hunting concessions surrounding the Hwange National Park were having a negative impact on the conservation of the population (Loveridge, et. al. 2007). Data collected between 1999 and 2004 suggest that this was indeed the case and this contributed to a suspension of sport hunting of lions in the area surrounding the Park between 2005 and 2009. This was a crucial shift in management policy for this species and an important step towards sustainable management and conservation of lions. Following the imposition of the hunting moratorium, lion densities increased (Figure 4).

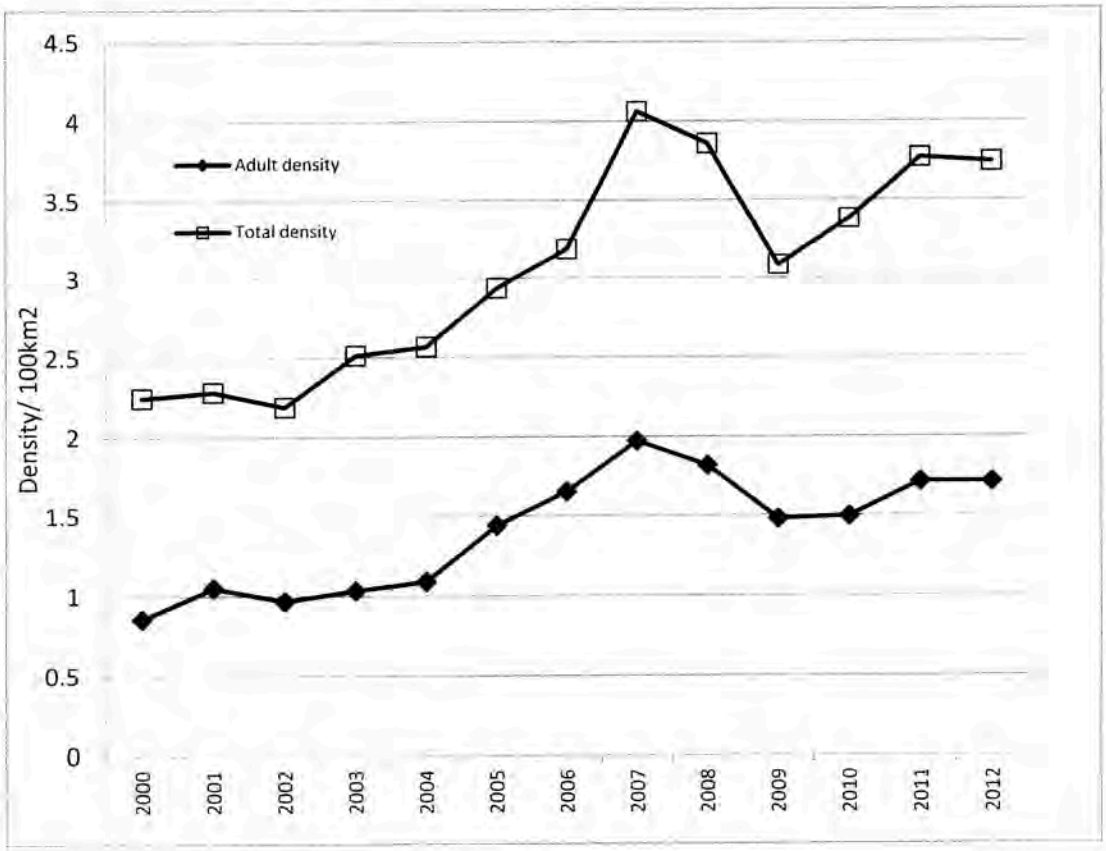
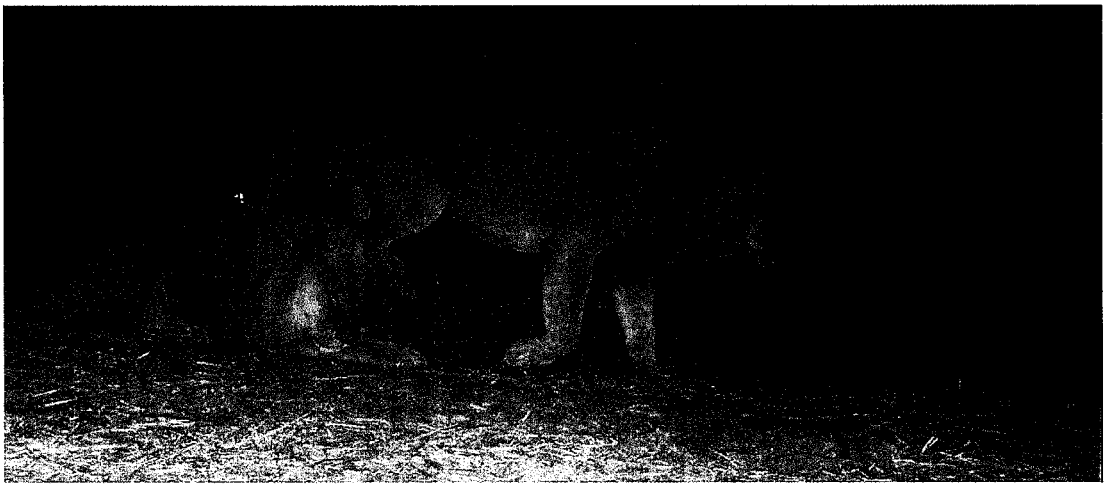


Figure 4: Lion densities in the Hwange area between 2000 and 2012

Following the lifting of the moratorium, and by implementing strict monitoring and hunting guidelines, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals.

4.2.6 Zambezi National Park and Units 6 and 7

Victoria Falls Wildlife Trust (VFWT) in collaboration with ZPWMA and the Hwange Lion Research Project has recently completed both spoor count transects and a camera trap surveys in Zambezi National Park, and Units 6 and 7 of the Matetsi Safari Area. The preliminary results of these surveys show that the lion population has increased since 2013 to approximately 67 (Rodger Parry, pers comm.).



Coalition males, Zambezi National Park, June 2016 (*Photo credit: Jessica Dawson, Victoria Falls Wildlife Trust)*

4.2.7 Chizarira National Park and Chirisa/Sengwa Safari Area

A survey was undertaken jointly by the Zimbabwe Parks and Wildlife Management Authority and the African Lion and Environmental Research Trust in September 2015 (Dr Norman Monks pers comm.). The survey area consisted of the 1,910 km^2 Chizarira National Park (a non-hunting area) and the adjoining 1,713 km^2 Chirisa/Sengwa Safari Area (a hunting area). No large carnivore counts using the call-up method had previously been conducted in these contiguous protected areas.

The survey method used the standardized protocol of audio broadcasts of a buffalo calf in distress. Spoor counts were not used for these surveys since previous research had shown that the call-up method was more precise, took less time, and was less costly to complete to achieve accurate results. Up to three stations were sampled nightly commencing just after sunset.

Twelve call-up sites were sampled. Response to the call-up stations by lions was low with only 2 of the 12 stations visited. The population abundance was estimated to be 31.6 (0.872 lion 100/km^2), suggesting a decline of 68.4% since 2004 when estimates of lion numbers were provided to Bauer and van der Merwe, (2004).

5 Conservation in Zimbabwe

Zimbabwe Parks and Wildlife Management Authority (ZPWMA) falls under the Ministry of Environment, Water and Climate and it was established under the Parks and Wildlife Act of 1996 (Chapter 20:14) as amended by Act Number 19 of 2001. The rationale behind the establishment of the Authority was to allow it to retain all the revenue it generates to be ploughed back into conservation. The functions of the Authority are provided for in detail in section 4 of the Parks and Wildlife Amendment Act Number 19 of 2001. The Act gives the Authority power to control, manage and maintain Zimbabwe's wildlife resources.

Its **vision** is *"To be a World Leader in sustainable conservation"* and its **mission** is *"To conserve Zimbabwe's wildlife heritage through protection and sustainable utilisation of natural resources for the benefit of present and future generations."*

5.1 STAFF ESTABLISHMENT

The staff strength at the beginning of January 2015 was 2,043 and ended at 2,044 on 31, December 2015 (2015 Annual Report (unpublished). Fifty (50) rangers were recruited in 2015. The following is the staff status report as at 31st December, 2015 (Table 7).

Table 7: Summary Staff Establishment by Region

Position	Grade	HQ	VMU	Northern	Western	Southern	Central	Total
Executive	F & E	3	0	0	0	0	0	**3**
Department Managers/Sectional Heads	D3-D5	19	0	3	4	3	3	**32**
Ecologists/ Area Managers/Officers	D1-D2	11	1	19	19	13	4	**67**
Snr Rangers /Officers	C1-C5	29	6	64	89	49	34	**271**
Rangers/Clerical	B2-B5	33	12	507	461	310	197	**1,520**
Gen. Hands / Lodge Attendants	B1	2	2	30	66	33	17	**150**
TOTAL		**97**	**21**	**623**	**639**	**408**	**255**	**2,043**

The current remuneration levels have remained low with the lowest paid worker receiving a gross salary of $375 per month. The last salary increase of 23% was in January, 2014. A comparison with other Parastatals within the same parent ministry, shows that the Authority has the lowest salary scales.

5.2 TRANSPORT OPERATIONS

As indicated in Table 8, the total cost of operating the Parks transport fleet was is $1,547,172.82 (excluding insurance and licensing) in 2015. The existence of old and obsolete vehicles in the fleet increases costs as most of them require major component replacements thereby increasing vehicle downtime.

Table 8: Overall travel and fuel consumed by Region

Station	Km travelled	Fuel Consumed		Repairs & Maintenance Cost ($)	Total Cost ($)
		Litres	Cost ($)		
Head Office	1,489,294	190,644	272,620	136,419	409,039
Northern	1,429,260	149,577	213,895	147,113	361,007
Southern	1,075,077	110,111	157,458	59,548	217,006
Western	1,313,263	142,012	203,077	161,120	364,196
Central	392,885	47,995	68,632	127,288	195,920
TOTAL	**5,699,779**	**640,339**	**$915,684**	**$631,486**	**$1,547,172.**

Table 9 below summarises the status of the Authority's vehicle fleet as of 2015. Out of the fleet complement of 316 (including tractors and motor cycles), only 70% are in sound condition.

Table 9: Number of vehicles per region

Region	Runners	Non-Runner	Total	% of Non-Runner
Head Office	41	6	47	13
Northern	53	19	72	26
Southern	30	21	51	41
Western	80	39	119	33
Central	17	10	27	37
Total	**221**	**95**	**316**	**30**

The Authority also owns three aircraft: Bell Jet Ranger and Robinson R22 Beta 11 helicopters, and a Cessna 185. The Jet Ranger is based at Hwange National Park and is used for game capture and law enforcement. The remaining aircrafts are non-operational.

5.3 LAW ENFORCEMENT

A major component of the Authority's mandate is law enforcement. This has become increasingly more important with the escalation in illegal wildlife trade, particularly involving elephant and rhino. The Authority has an establishment of 2,146 rangers however by the end 2015, there were 1,448 rangers in post (67%). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations.

The level of effort of law enforcement over the last 3 year is summarised in Table 10. In 2015 there were 2,139 incursions detected, and arrest of 1,354 local and 129 foreign poachers. The number of armed contacts declined from 26 in 2014 to 23 in 2015, and number of poachers killed declined from 13 in 2014 to 11 in 2015. Recoveries made in the field included 25 rifles, 276 rounds of ammunition, 496 pieces of elephant ivory, 4 rhino horns and 5,133 wire snares.

Table 10: Detections, Arrests and Recoveries for 2013, 2014 and 2015

Year	No of Incursions	No of contacts		Number of poachers				Recoveries					Other recoveries and arrests		
				Killed		Arrested									
		Armed	Visual	Local	Foreign	Local	Foreign	Rifles	Ammunition	Ivory	Rhino horn	Snares	Gold	Poachers Camp	Dogs
2013	1842	27	344	9	0	1421	131	20	945	436	5	4415	93	264	180
2014	1571	26	362	10	3	4161	94	20	163	202	19	4864	221	186	272
2015	2139	23	356	6	5	1354	129	25	276	496	4	5133	134	339	167

5.3.1 Illegal Harvesting of Wildlife

Commercial wildlife poaching involving both local and foreign nationals continues to plague Zimbabwe, especially with respect to elephant and rhino located in the Zambezi Valley, Sebungwe, North-West Matabeleland, South-East Lowveld. The species targeted are shown in Table 11 and 12. Note that 21 lions were killed illegal between 2013 – 2015, with 6 animals killed through snaring in the area adjacent to Hwange National Park in 2015.

Table 11: Trends in wildlife poaching in the parks estate

Year	Illegally killed wildlife										
	Elephant	Buffalo	**Lion**	Kudu	Zebra	Impala	Warthog	Nyala	Eland	Crocodile	Waterbuc k
2013	293	65	**12**	65	21	67	22	5	6	2	15
2014	176	44	**2**	34	8	65	26	2	5	3	15
2015	317	78	**7**	76	21	92	46		9	17	6
2016*	101	23	**0**	23	22	54	12	1	4	1	5
Total	**807**	**210**	**21**	**200**	**72**	**278**	**106**	**8**	**24**	**23**	**41**

*To September 2016

Table 12: Illegally killed wildlife 2015 in the four regions

Region	Elephant	Buffalo	**Lion**	Kudu	Sable	Zebra	Croc	Impala	Eland	Warthog	B/Buck	waterbuck
Central	46	30	**0**	16	0	6	1	28	0	17	7	
Northern	75	6	**0**	6	0	0	0	0	0	0	0	0
Southern	65	38	**1**	42	0	9	4	31	4	25	1	6
Western	131	4	**6**	12	1	6	12	33	5	4	1	0
Total	**317**	**78**	**7**	**76**	**1**	**21**	**17**	**92**	**9**	**46**	**9**	**6**

5.3.2 Illegal trophy hunting – the "Cecil" effect

Professional hunter Theodor Bronkhorst was arrested for allegedly illegally hunting of a lion popularly known as 'Cecil' with a foreign client on Antoinette and Antoinette farm in Gwayi River Conservancy (which is adjacent to Hwange National Park). The same case involved Umguza Rural District Council in alleged illegal quota transfer[1]. At the time of writing, this case has not been brought before the court, and is still under judicial review[2].

The Authority immediately implemented the following measures in response to this incident:

- Hunting of lions, leopards and elephant in areas outside of Hwange National Parks required confirmation and authorization in writing by the Director-General of the Zimbabwe Parks and Wildlife Management Authority, and all hunts are to be accompanied by the Authority's staff whose costs will be met by the landowner.
- Bow hunting was suspended except with confirmation and authorization in writing by the Director-General of the Zimbabwe Parks and Wildlife Management Authority.
- Members of the hunting fraternity were reminded that it was illegal for quotas to be transferred from one hunting area to another. Any case of quota transfer would be regarded as poaching, and the Authority will not hesitate to arrest, prosecute, and ban for life any persons including professional hunters, clients and land owners who were caught on the wrong side of the law.

[1] This system facilitated the transfer of a quota from one property to another has since been suspended by the Authority.

[2] Note: This case has been dismissed by the court on 12th November 2016.

- 2015 hunting quotas and permits for Antoinette and Antoinette farm, Railway farm 33, Umguza Rural District Council and Kusile Rural District Council were suspended.
- Professional hunters' license for Theodor Bronkhorst was suspended.

5.4 Human Wildlife Conflict

The Authority is called upon to deal with human-wildlife conflict (HWC) issues across the country, and this continues to be a challenge. A total of 863 reports of problem wild animals causing threat to human life and property were received in 2015 compared to 1,637 reports in 2014 (Table 13). From these incidents, a total of 39 human fatalities by crocodiles, elephants, lions and buffaloes were recorded in 2015 compared to the 27 fatalities in 2014.

Table 13: Trends of Human and Wildlife Conflict Incidents

Year	Total Reports Received	People killed	People Injured	Cattle killed	Goats killed
2013	1 088	21	16	67	65
2014	1 637	27	24	217	129
2015	863	39	23	232	213
Total	**3 588**	**87**	**63**	**516**	**407**

The scale and species involved in HWC is summarised in Table 14. The authority received 200 problem lion reports and responded to 177. One person was killed by lion, and 206 livestock. The Authority elected to capture problem lion (6) rather than destroy the animals.

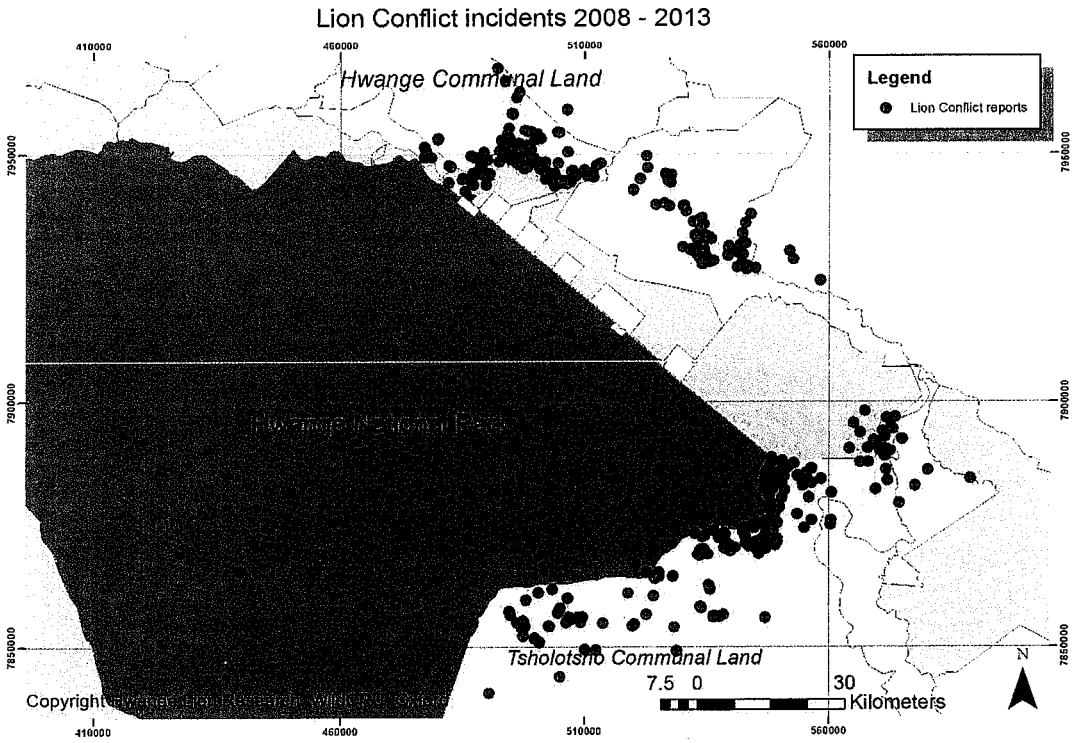
Table 14: Scale of countrywide human wildlife conflict in 2015.

Species	Nature of problem	No of reports received	Reports attended	Number of animals eliminated		People		Livestock killed		
				Killed	Captured	Killed	Injured	Cattle	Donkeys	Goats
Baboons	Damage to infrastructure, crop raiding, threat to humans	109	105	51	48	0	0		0	0
Buffalo	Threat to human life and crop raiding	46	40	0	15	2	1		0	0
Elephant	Threat to human life, crop raising, destroying property	216	177	0	38	4	5	0	0	0
Hippo	Threat to human life and crop raiding	131	87	0	34	0	0	0	0	0
Crocodile	Threat to human life and killing livestock	106	85	39	9	27	14	16	1	47
Hyenas	Killing livestock	36	18	0	7	0	0	68	2	54
Leopard	Killing livestock	19	11	0	1	0	0	32	0	33
Lion	**Threat to human life and livestock killing**	**200**	**177**	**0**	**6**	**1**	**0**	**115**	**12**	**79**
Total		863	700	90	158	34	20	231	15	213

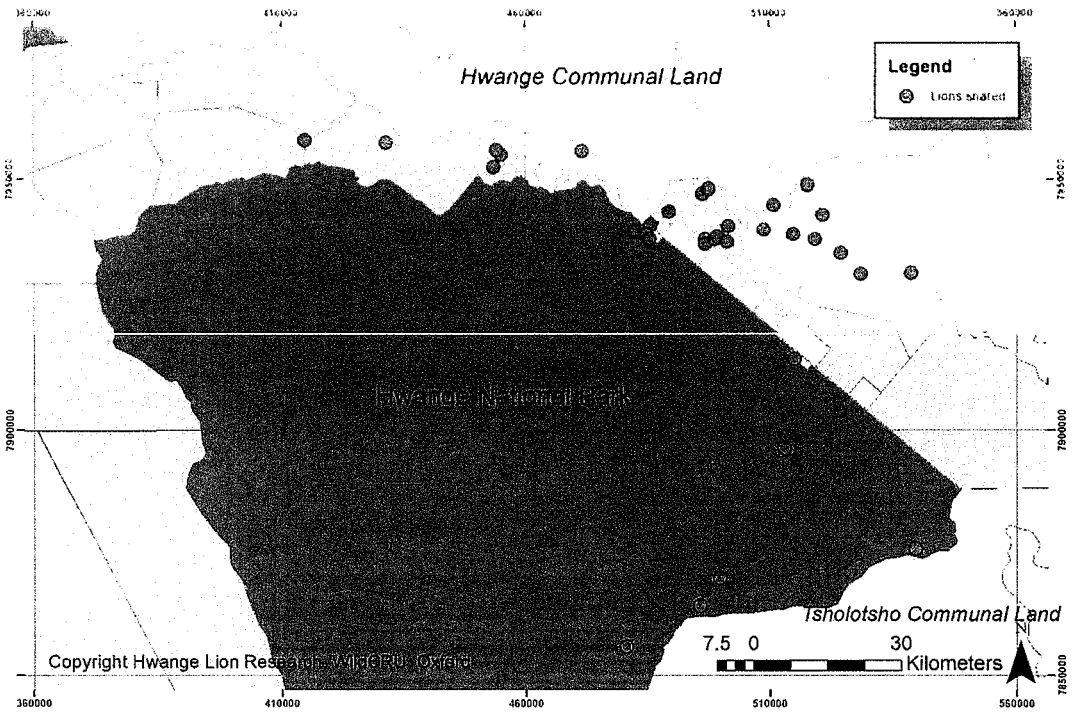
5.4.1 Case Study of Human- Lion Conflict from Hwange National Park

The following information has been extracted from the Hwange National Park Management Plan (ZPWMA, 2016) and is provided here to illustrate the challenges facing the management of lion populations residing adjacent to communal and commercial properties. Variations of the scenario described here apply to other areas of the country where hyaenas and lions are the most problematic carnivores in the communal areas adjacent to protected areas. Hyaenas are perceived to be more of a problem than lions as they account for large numbers of livestock (cattle, goats and sheep). The data presented here has been extracted from the WildCru Lion Research project in Hwange and considers only lions.

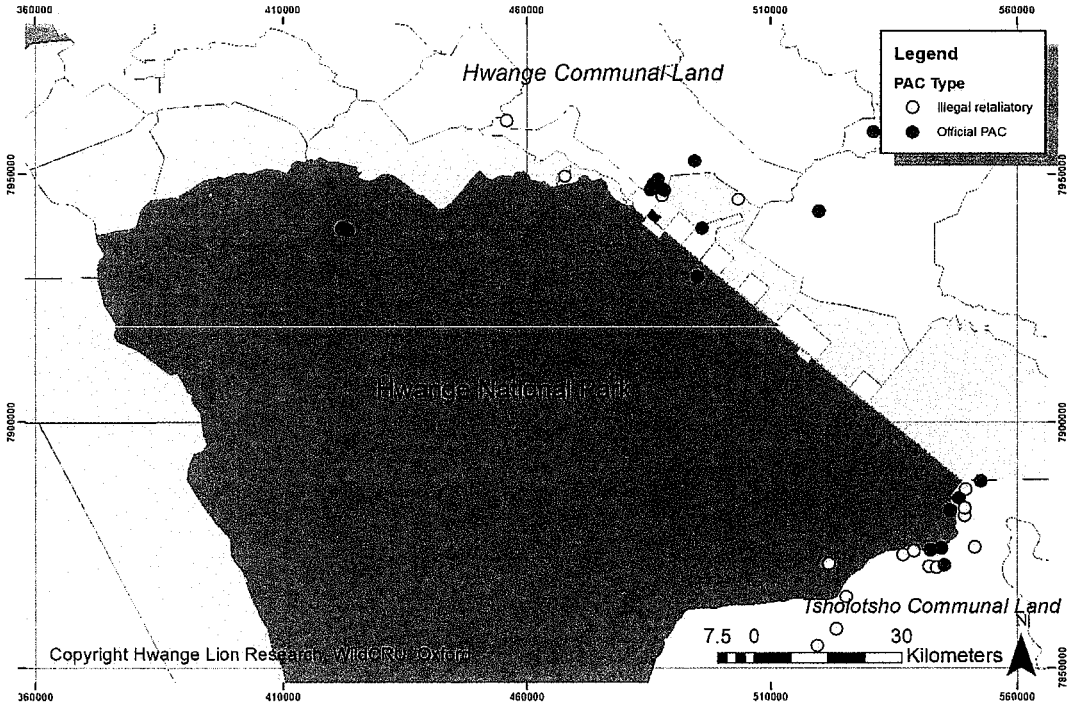
Since its inception in 2007 a significant component of the WildCru Lion Research project has focused on understanding the ecological and human socio-economic factors of conflict between the local agro-pastoralist people residing in Tsholotsho and Hwange Communal Land and lions. The project developed an intensive reporting system to record conflicts and has undertaken a detailed survey to record the baseline data on human wildlife conflict at the household level. Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock was lost to lions.



Lion deaths in wire snares 1998 - 2014



Problem Animal Control (PAC) 1998 - 2014



To mitigate this conflict, the project has initiated the "Long Shields Guardian Programme" whereby communities are notified of movements of collared into their areas via cell phone who then motivate the community to take appropriate action (i.e. moving the cattle, chase the lions etc.). In 2013 alone,

1,850 warnings were passed to the "Long Shields". In addition, the project is working on improving bomas and husbandry techniques as another way to lessen the conflict between lions and people, and although these actions may reduce the incidents of livestock marauding lions, cattle deaths still occur resulting in retaliatory killings or action on the part of National Parks to destroy the animals.

5.5 Trend in Financial Performance of the Authority

The average Income and Expenditure for the period 2010 – 2015 is shown in Table 15 that highlights the inability of the Authority to generate adequate revenue to cover both the capital and operating requirements. The average total income over this period is US$22.4 million (range US$16.5 – US$29.3 million). For the period ending December 2015, the Authority generated total revenue of $24,1million, which is 32% below the anticipated budget of $35.5 million. This includes a government grant of $716 000 and a donation of vehicles and equipment worth $2,1 million from the Government of China.

The average total expenditure for the period 2010 – 2015 is US$25.3 million (range US$18.1 – US$30.7 million). The Authority has thus incurred a loss of approximately US$2.8million/year. For the year ended December 2015, the Authority incurred a loss of US$5,4 million including depreciation.

The Authority is dependent on income from Conservation Fees (i.e. entry fees to Parks etc.) that accounted for 39% in 2015 (average 34%/year), hunting (13% in 2015) and leases (10% in 2015, Table 15).

Although individual salaries remained low, staff costs in 2015 were $20,7 million which is 71% of total revenue raised (average 64%). This is unsustainably high and leaves very limited resources for operation (16%), marketing (1%) and administrative expenses (7%, Table 15).

The major reasons for the budget deficits in the past six years can be attributed to:

- Declining income from hunting – this has been exacerbated by the recent bans imposed on elephant trophy imports into the United States by US Fish Wildlife Service (USFWS) and the much-publicised death of *Cecil the lion* that had a negative effect on revenue generated from hunting.
- Government Grant – The Authority has not received meaningful funding from the fiscus despite requests made by management that non-revenue generating activities which are of national nature be funded by Government.
- The Authority failed to dispose of its ivory stock pile due to the continued ban on ivory trade by CITES. The ivory stock which the Authority is currently holding exceeds 80 tons.

Table 15: Statement of Comprehensive Income for period 2010 – 2015 and the year ended 31 December 2015 (extracted from 2015 ZPWMA Annual Report).

Revenue	US$ 2015	%	Average 2010 - 2015	%
Conservation Fees Land	$7,879,987	33%	$6,506,508	29%
Conservation Fees River	$1,409,160	6%	$1,136,041	5%
Accommodation	$1,720,640	7%	$1,904,477	8%
Annual registration	$507,211	2%	$722,847	3%
Permits	$1,476,176	6%	$849,916	4%
Service and Facilities	$307,692	1%	$152,616	1%
Law enforcement (fines etc.)	$224,657	1%	$215,591	1%

Revenue	US$ 2015	%	Average 2010 - 2015	%
Hunting income	$3,256,698	13%	$5,049,089	22%
Fishing permits	$561,797	2%	$941,833	4%
Leases and rentals	$2,434,676	10%	$1,880,258	8%
Parks product sales	$623,084	3%	$767,347	3%
Examinations	$116,000	0%	$70,873	0%
Projects	$349,864	1%	$248,614	1%
Other income/donations	$2,555,729	11%	$907,169	4%
Government grant	$716,000	3%	$1,141,119	5%
Total	**$24,139,371**			
Expenditure				
Operational costs	$4,801,815	16%	$5,146,091	20%
Staff costs	$20,766,023	71%	$16,311,677	64%
Marketing and promotions	$212,406	1%	$147,334	1%
Administration costs	$2,056,681	7%	$2,631,019	10%
Depreciation	$1,531,000	5%	$1,069,138	4%
Total expenditure	**$29,367,925**		**$25,305,258**	
Operating surplice/deficit	-$5,365,082		-$2,810,962	

The Authority receives considerable support from many local and international NGOs who undertake a variety of routine management activities e.g. supply and maintain artificial game water supplies, provide logistic support to law enforcement operations. This is in addition to the support provided by hunting operators that hold concessions in the Safari Areas.

6 Stakeholder involvement in lion management and conservation

There are several private sector initiatives that are directly or indirectly involved with lion management and conservation both inside and outside the Parks estate. These stakeholders are represented by companies from the consumptive and non-consumptive sectors of the industry.

6.1 Beneficiaries of Wildlife Based Land Use

Various forms of wildlife based land use occur in Zimbabwe that benefit different segments of the community depending on the authority for the land. Table 16 summarises these broad categories. The Authority is the direct beneficiary from the use of wildlife in National Parks and Safari Areas while the Forestry Commission is the beneficiary in Forestry Areas. In terms of the Act, Communal CAMPFIRE areas are the primary beneficiaries where the income generated from hunting is shared between the Rural District Council and Community Wards (see below). Similarly, private conservancies and land owners are the primary beneficiaries.

Collectively, these different management regimes contribute to the overall conservation of the wildlife both inside and outside the Parks Estate, and is supported through the existing policy and legal framework that facilitates incentives to promote wildlife based land use.

Table 16: Direct beneficiaries from Wildlife Based Land Use

Land category	Direct Beneficiary
National Parks and Safari Areas	Zimbabwe National Parks and Wildlife Management Authority
Forestry Areas	Forestry Commission
Communal Campfire Areas	Rural District Council and Wards
Private Conservancies	Private Landowners

6.2 CONTRIBUTION OF THE PRIVATE SECTOR

A questionnaire was circulated to all safari hunting operations to gather data on:

- Area and land category where hunting takes place
- Payments in terms of concession fees
- Number of people employed
- Approximate value of investment in assets
- Approximate costs of the hunting operations
- Hunter days generated through various packages
- Indication of the prey base

Data from 18 companies that have been allocated lion on quota and offer these trophies as part of their hunting packages is summarised below (Table 17). These data indicate that

- The average hunting concession covers 1,590km^2 and generates $178,488 in concession fees annually.
- Each company on average employs 109 people of which 24 are seasonal staff (22%). Law enforcement staff make up 26% of the staff complement.
- On average, each company has invested approximately $1.3 million in fixed and moveable assets (buildings, tents, vehicles, equipment etc.).
- On average, each company incurs approximately $1 million in expenses annually, with staff wages (24%) and operating expenses (27%) forming the bulk of these costs.
- Lion safaris contribute approximately 9% (126 hunter days) to the 3-year average number of hunter days generated (1,405) with the bulk of hunter days generated from buffalo safaris (see below for more details on the financial significance of this contribution).
- On average, each hunting area supports 2,000 large mammals, 3,000 medium sized mammals and 6,000 small sized mammals. However, there are large differences between state, forestry, CAMPFIRE and conservancies areas. State areas tend to support more large animals (buffalo, giraffe) while conservancies support greater numbers of medium and small animals.
- Observations on the status of lion populations indicates that each area supports on average 5 prides of 7 animals (i.e. 35 lions) although there is a wide variation in these numbers with more prides occurring in the conservancies than on Forest and CAMPFIRE areas. In these areas, the operators report that lion are transient/migratory rather than permanent.
- All areas report incidents of human-lion conflict, including incidents of snared animals.

Table 17: Summary of 18 hunting company statistics where lion hunting occurs

Companies (N=18)	Total	Average	
Total Hunting Area (ha)	2,872,932	159,607	
Concession fee	$2,141,860	$178,488	
Number people employed			
Owner/Manager	65	4	3%
Administration	59	3	3%
Camp Maintenance	308	17	16%
Safari operations	295	17	16%
Professional Hunters	82	5	4%
Skinners	59	3	3%
Trackers	138	8	7%
Law enforcement	449	28	26%
Seasonal/Casual staff	379	24	22%
Average Staff employed/company		**109**	
Approximate Asset Value (US$)	**$21,557,610**	**$1,347,351**	
Major Expense Items			
Central Government Licenses:	$415,700	$25,981	3%
ZNWMA Fees:	$1,932,472	$128,831	13%
Community Development:	$525,378	$35,025	4%
Law Enforcement:	$1,319,562	$87,971	9%
Staff wages & Welfare:	$3,601,439	$211,849	24%
Administrative costs:	$1,870,267	$116,892	13%
Operating expenses:	$3,986,619	$249,164	27%
Management and Marketing costs	$661,974	$41,373	4%
Any other costs	$411,693	$25,731	3%
Overall costs	**$14,725,104**	**$922,818**	
Hunter days generated over 3 years			
Lion	2,137	126	9%
Leopard	4,565	269	19%
Buffalo	10,344	608	43%
Elephant	3,131	184	13%
Plains game	999	59	4%
Total Hunter days	**25,294**	**1,405**	
Prey base status			
Large mammals (Buffalo, Giraffe)	28,190	2,014	
Medium mammals (Eland, zebra, kudu, waterbuck etc.)	53,273	3,552	
Small mammals (Bushbuck, warthog, impala)	82,297	5,878	
Status of lion population			
Number of prides	71	5	
Average pride size	80	7	

Companies (N=18)	Total	Average	
Number of cubs	243	19	
Number Coalition males	89	7	
Monitoring of lion population			
Natural deaths	4	1	
Reports of Human-Lion Conflict	33	5	
Incidents of infanticide recorded	6	2	

6.3 CAMPFIRE COMMUNITY PROGRAMMES

The right to exploit and benefit from wildlife was extended to communal areas through granting of Appropriate Authority Status over their wildlife resources to Rural District Councils in 1982. The intention was to return rights of access to natural resources through legislative change, devolve responsibility and economic empowerment. The CAMPFIRE model focuses on three main criteria:

- Voluntary interest in participation by communities and their Rural District Councils (RDCs),
- Presence of wildlife populations capable of producing sustainable and economically significant revenues.
- Benefit sharing for local communities based on:
    - The number of animals harvested within a local community's area each hunting season.
    - The extent of wildlife habitat present within a local community's area annually.

Currently 58 Rural Districts have been granted the Appropriate Authority status to manage wildlife resources in their areas, however only 16 are actively engaged in some form of wildlife based land use (see Figure 5).

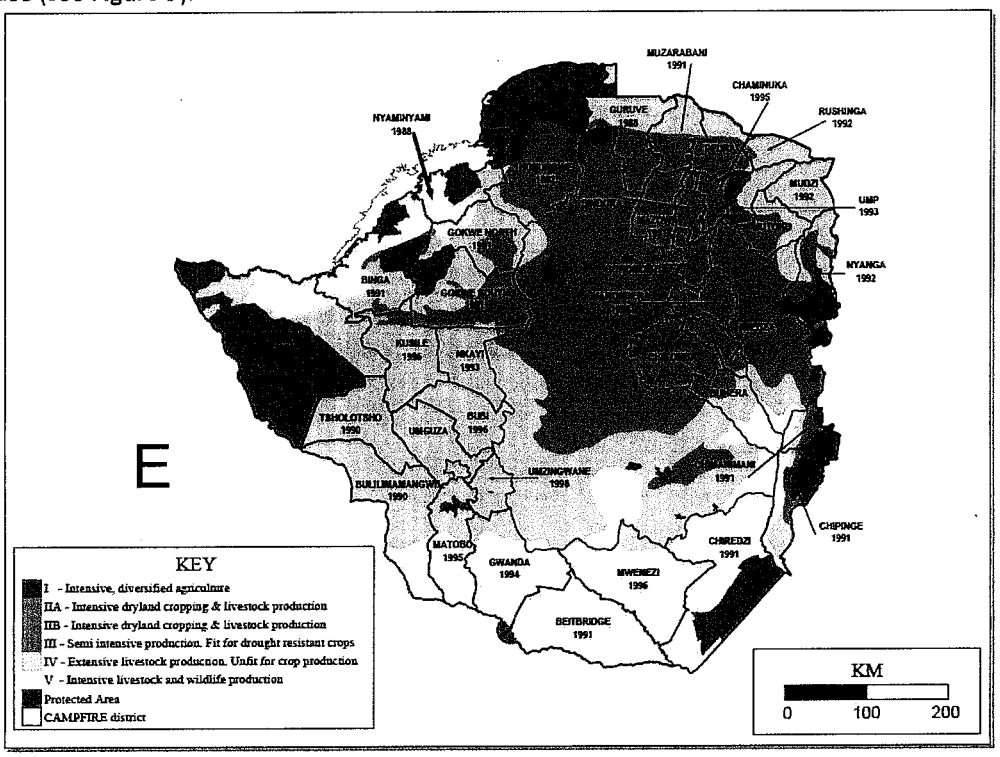


Figure 5: Map of Zimbabwe showing CAMPFIRE districts and year of establishment

The performance of ten key CAMPFIRE Districts is summarised below to illustrate the level of benefits that flow to RDCs, Wards and households, and the role that income from lion play in this process.

1. **OVERALL QUOTA ALLOCATION, UTILISATION AND INCOME GENERATION FROM KEY SPECIES: All Districts: 2010 - 2015**

	Elephant	Lion	Leopard	Buffalo	Hippo	Crocodile	Total
Quota	1,079	140	487	2050	602	471	
Offtake	655	45	193	908	270	305	
% Utilisation	61%	32%	40%	44%	45%	65%	
Total income N=6 years)	**$7,129,658**	**$240,000**	**$532,675**	**$2,263,150**	**$464,000**	**$441,903**	**$11,071,386**
Average/year	**$1,188,276**	**$40,000**	**$88,779**	**$377,192**	**$77,333**	**$73,651**	**$1,845,231**
Percentage	64%	2%	5%	20%	4%	4%	

The overall income generated over a 6-year period was US$11 million. An overall quota of 140 lions (average 23/year) were allocated to the CAMPFIRE programme over which 45 (32%) were utilised (8 per year). This generated US$240,000 or 2% of the overall income.

2. **SOURCE OF CLIENTS AND GROSS INCOME TO SAFARI OPERATIONS:2010 - 2015**

Origin of Clients	USA	Canada	South America	Europe	Asia	Middle East	Oceania	Africa	Total (N=6 years)
Total	**880**	**16**	**54**	**456**	**82**	**9**	**51**	**131**	**1679**
Percentage	51%	1%	3%	27%	5%	1%	3%	8%	
Total	**$8,624,059**	**$150,987**	**$543,003**	**$5,201,168**	**$550,062**	**$781,076**	**$394,208**	**$567,897**	**$16,812,459**
Average/year	**$1,462,508**	**$25,165**	**$90,500**	**$866,861**	**$91,677**	**$130,179**	**$65,701**	**$94,650**	**$2,802,077**
Percentage contribution	**51%**	**1%**	**3%**	**31%**	**3%**	**5%**	**2%**	**3%**	

Hunting clients from the USA are by far the most numerous (880 over 6 years) contributing 51% (or US$8.6 million) of the estimated US$16 million generated from hunting in CAMPFIRE areas from 2010 - 2015.

3. **INCOME TO DISTRICTS: 2010 - 2015**

	Hides (US$)	Trophy fees (US$)	Percentage of daily rate	Hunting concession fees	Photographic (lease fees/bed night levy)	Other (vehicle hire, grinding mill etc.)	Total	Average (N=6)
Total	$131,741	$10,618,127	$1,277,525	$862,721	$737,613	$731,218	$14,358,945	$2,393,158
Percentage	1%	74%	9%	6%	5%	5%		

The CAMPFIRE districts that benefit from hunting rely heavily on trophy fees (74%) as their primary source of income.

4. INCOME TO WARDS, VILLAGES AND HOUSEHOLDS: 2010 – 2015

Overall Income to CAMPFIRE Wards: 2010 - 2015						
	No Concessions	Area (ha)	Number Wards	Number Villages	Number Households	Gross Income
Total	26	2,288,284	62	603	56,297	$5,946,370
Income (n=6 YEARS)	$228,706.55	$3	$95,909.20	$9,861.31	$105.6	

Income generated at the District level is then disbursed to Wards. Since 2010, this is estimated to be approximately US$5.9 million. The available data shows that 62 wards representing 603 villages (or 56,297 households) received the equivalent of US$95,909/ward (or US$105/household).

These levels of income are not sufficient to make a significant impact at the individual level, and require that the Districts and Wards channel these revenues into activities that benefit the overall community. This is achieved through supporting several communal projects such as schools, clinics, water provisions etc.

5. DISTRICT EXPENDITURE AND COMMUNITY BENEFITS: 2010 - 2015

	Administration	Law Enforcement	Compensation	Management	Social Services	Other	Total
Total	$2,486,268	$1,778,100	$67,600	$682,740	$1,084,779	$779,030	$6,878,517
Average	$414,378	$296,350	$11,267	$113,790	$180,796	$129,838	$1,146,420
Overall costs	$5,014,708				$1,084,77	$779,039	
Percentage	73%				16%	11%	

At the District level, 73% of the revenues from hunting are channelled towards administration, law enforcement, compensation and general management while limited funds are used to support social services (16%).

6. WARD EXPENDITURE AND COMMUNITY BENEFITS

	Administration costs					Community Benefits				
	Meetings & Admin	Wages/salaries	Compensation schemes	Management activities	Project Management Costs	Social services	Food security	Direct cash benefits	Other	Total
Total	**$553,260**	**$815,639**	**$56,432**	**$312,178**	**$345,762**	**$2,468,216**	**$223,659**	**$216,077**	**$139,565**	**$5,302,709**
Overall costs	**$2,083,271**					**$2,907,952**			**$139,565**	
Percentage	**39%**					**55%**				

At the Ward level, where communities are directly involved, the tendency is to channel most the income towards community benefits (55%) rather than administration which is seen to be the responsibility of the local government. This means that the bulk of the income from hunting is used to support social services such as schools, clinics, irrigation schemes etc. where the impact at the community level (village, household) is far greater (Figure 6).

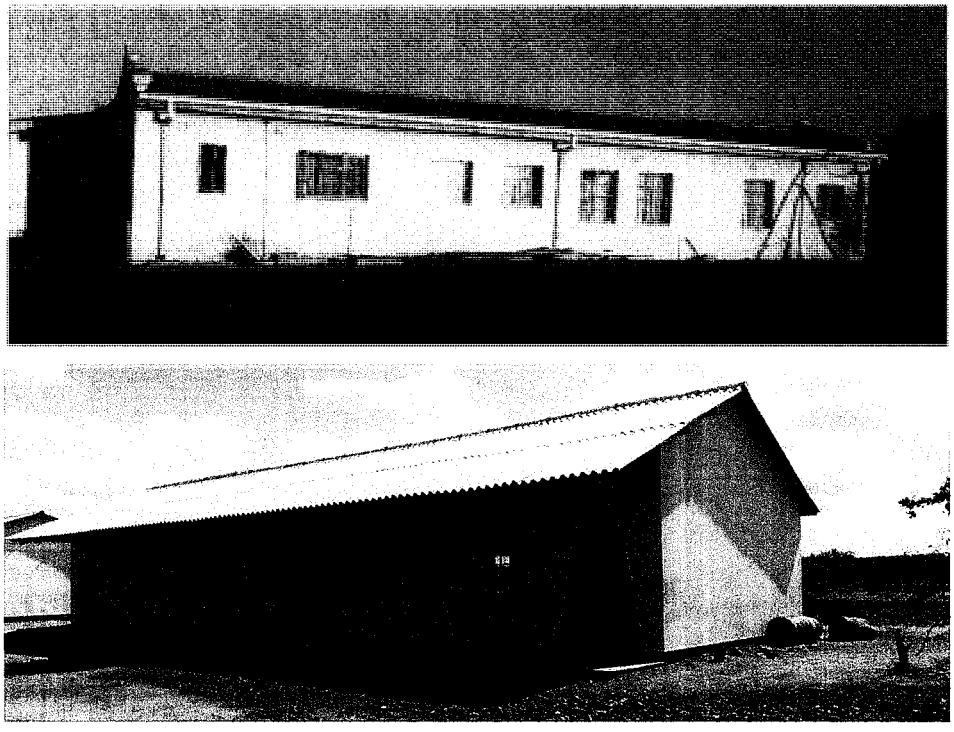


Figure 6: Bhemba Clinic in Ward 2 of the Tsholotsho Communal Area (top) and Masera Secondary School (Beitbridge, bottom) that are supported by funds generated through the CAMPFIRE programme

Species	2014	2015	Total	2015 Quota	Utilised	% Utilised
Lion	**$630,950**	**$753,000**	**$1,383,950**	**82**	**49**	**59%**
Leopard	$714,100	$668,490	$1,382,590	530	151	28%
Zebra	$594,239	$555,744	$1,149,983	2,480	600	24%
Sable	$456,615	$309,260	$765,875	718	78	11%
Kudu	$341,092	$357,963	$699,055	2,503	289	12%
Waterbuck	$293,903	$256,133	$550,036	988	156	16%
Hippo	$310,321	$217,470	$527,791	303	83	27%
Impala	$277,198	$242,624	$519,822	8,594	1,261	15%
Other Species	$1,465,560	$1,287,845	$2,753,405			
Grand Total	**$11,099,187**	**$8,288,049**	**$19,387,236**			

7.1.3 Total trophy fees generated by land category

The ZPWMA allocated quotes to all owners and occupiers of land in terms of SI 26. Any person utilising wildlife on these properties is required to submit a TRAS2 form to process any export of trophies and other animal products. Approximately 262 companies/properties submitted returns in 2014 and 2015. From these data, it is possible to determine the income generated from trophy fees and daily rates per company. To protect the privacy of the individual companies, these data have been arranged to show the level of income generated by different land categories from trophy fees (Figure 8),

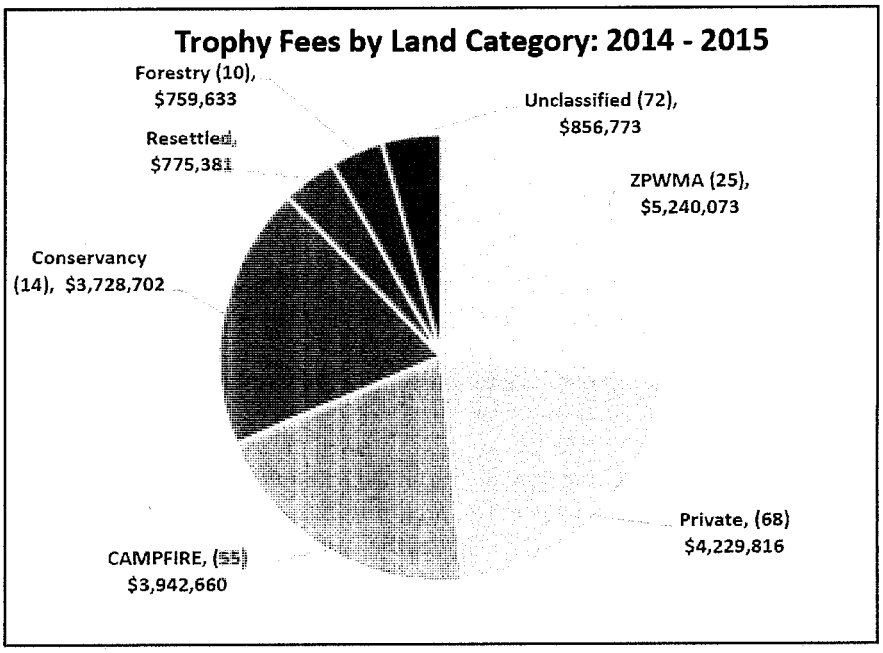


Figure 8: Hunting Trophy Fee Earnings by Land Categories (2014 - 2015). Note that from the description provided in the database, it was not possible to allocate some individual properties to a specific category. These have been recorded as unclassified (adapted from Computerised Exports Payments Exchange Control System, CEPECS - TRAS2).

Overall, approximately US$10.7 million was generated in 2014 and US$8.7 million in 2015 from the 62 species on offer. The ZPWMA represented by 25 properties that it either offers on tender to the private sector or operates as hunting areas itself generated the largest income from trophy fee sales

(US$5.2 million). The 14 Conservancies accounted for US$3.7 million while the 68 private properties are recorded as generating US$4.2 million. The CAMPFIRE areas (N=55) generated US$3.9 million.

Together with the income from daily rates (US$13,190,372 in 2014 and US$9,684,396 in 2015 (gross US$22,874,768), extracted from Computerised Exports Payments Exchange Control System, CEPECS - TRAS2), these funds are used to pay for several operational expenses including employment, law enforcement, administration and management.

7.5 Quota Setting Process

The process for quota setting follows procedures agreed to by all stakeholders (ZPWMA, 2014).

- Step 1: Allocate existing quota to each block/hunting area

The starting point for implementation of age-restrictions and adaptive quota management was to allocate existing lion quotas. This quota would then be managed adaptively in line with the age of lions hunted. In future, it is envisaged that fixed quotas for lions would fall away as quotas would be based on the age of lions hunted in the previous year.

- Step 2: Hunters complete and submit return forms and photos after each lion hunt

The data would be compiled into a database by a ZPWMA representative (currently Ms Roseline Mandisodza-Chikerema, Senior Ecologist, ZPWMA). Export permits for trophies will not be issued unless completed hunt return forms (all the required photographs and the first upper premolar) is provided to ZPWMA for aging and monitoring purposes. Furthermore, because the following year's quotas will be based on the ages of the lions hunted in the current year, operators must submit their lion hunt returns and photographs soon after the hunt. At the end of the season, all the teeth would be taken to a dentist to have x-rays conducted to allow for measurement of the size of the pulp cavity.

- Step 3: ZPWMA and Panel of experts assign an age value to each lion trophy

Lion trophies will be aged by ZPWMA, with input from lion scientists and representatives from the hunting industry at a trophy aging session. This is conducted at the end of each hunting season.

- Step 4: Calculate the next years' quotas based on a points system for the ages of lions hunted

A quota setting meeting is held where lion quotas are established for each area based on the age of lions hunted in those areas the year before. This programme commenced in 2014, and so the ages of lions hunted in 2014 will affect the lion quotas in 2015. Table 19 summaries the trend in lion quota allocations since 2002 while Table 12 provides a detailed overview of the lion trophies taken in 2015.

Table 19: Summary of lion quota allocations and offtake since 2002 (Data provided by ZPWMA)

Year	Lion Allocated Quotas	Female Offtake	Male Offtake	% Utilisation
2002	126	22	49	56%
2003	138	5	11	6%
2004	155	4	9	8%
2005	108	3	20	21%
2006	124	1	17	14%

Year	Lion Allocated Quotas	Female Offtake	Male Offtake	% Utilisation
2007	117	0	9	7%
2008	90	0	17	18%
2009	111	0	9	8%
2010	98	12	30	43%
2011	121	20	38	48%
2012	101	18	27	44%
2013	101	1	34	34%
2014	101	0	37	26%
2015	82	0	49	60%
2016	81	0	33	41%

Table 20: Analysis of lion trophies taken on various properties in 2015

Hunting Area Name	Sex	Killed Wounded	Grid Ref	Date Shot	Trophy Size
Sapi Area	M	KILLED	35l0783	03/06/2015	
Matetsi Safari Area - Unit 3	M	KILLED	307551	05/04/2015	61.31
Antoinette & Antoinette Extension	M	KILLED	187159	02/07/2015	26 7/16"
Tsholotsho District Area 2-South	M	KILLED	S1926181 E02652250	27/10/2015	25 6/8 inches
Hurungwe Safari Area - Rifa	M	KILLED	35K178113	10/05/2015	24.5
Deka Tail	M	KILLED	651 480	10/04/2015	60.38 cm
Hurungwe Safari Area - Nyakasanga	M	KILLED	s15.56.457 e029.15.584	07/06/2015	26
Msaise	M	KILLED	VN204700	14/05/2015	23
Mapari	M	KILLED	VN798124	09/06/2015	23SCI
Ngamo/Sikumi	M	KILLED	456923	09/05/2015	
Deka Safari Area	M	KILLED	278493	26/06/2015	61.5
Mbire (Guruve) South Area 2	M	KILLED	919056	09/08/2015	25.3
Bubye Valley Conservancy	M	KILLED	0194090 7625410	21/02/2015	25"
Bubye Valley Conservancy	M	KILLED	9337	29/03/2015	26"
Bubye Valley Conservancy	M	KILLED	31129	07/04/2015	25
Woodlands Farm	M	KILLED	644972	22/05/2015	25"
Bubye Valley Conservancy	M	KILLED	35K 453 159	10/05/2015	23.625
Bubye Valley Conservancy	M	KILLED	36K 908 852	25/04/2015	25"
Chewore Safari Area - North	M	KILLED	TT015643	05/06/2015	25
Bubye Valley Conservancy	M	KILLED	36K 227 593	12/05/2015	26"
Matetsi Safari Area - Unit 4	M	KILLED	4.05E+12	09/06/2015	24
Matetsi Safari Area - Unit 5	M	KILLED	865505	09/06/2015	25.25
Gunundwe	M	KILLED	822094	11/06/2015	
Bubye Valley Conservancy	M	KILLED	36K 004 971	24/06/2015	25.5625

Hunting Area Name	Sex	Killed Wounded	Grid Ref	Date Shot	Trophy Size
Bubye Valley Conservancy	M	KILLED	942 151	25/06/2015	12
Kusile District Area 1	M	KILLED	S185604.9 E0271547.4	02/07/2015	
Mokore Ranch	M	KILLED	VN110030	15/07/2015	15"
Bubye Valley Conservancy	M	KILLED	36K 229 607	29/07/2015	26"
Bubye Valley Conservancy	M	KILLED	191 623	25/07/2015	27.0625
Nyaminyami District Area 2 (Omay)	M	KILLED	657019PM	18/07/2015	24 1/8"
Matetsi Safari Area - Unit 5	M	KILLED	862 451	15/07/2015	25 8/16 inches
Matendere	M	KILLED	781021	26/07/2015	23.875
Matetsi Safari Area - Unit 1	M	KILLED	740726	13/08/2015	25
Bubye Valley Conservancy	M	KILLED	213 602	15/08/2015	15
Sango	M	KILLED	62691	23/08/2015	23.125
Sango	M	KILLED	320548	27/08/2015	
Dande Safari Area	M	KILLED	945352	13/10/2015	24in
Hurungwe Safari Area - Rifa	M	KILLED	35k062038	30/09/2015	25.25
Bedford	M	KILLED	190429	06/09/2015	
Ngamo/Sikumi	M	KILLED	456919	07/09/2015	
Bubye Valley Conservancy	M	KILLED	206 622	23/09/2015	26"
Hammond	M	KILLED	35k880103	17/10/2015	23.375
Kazuma/Panda Masuei	M	KILLED	s18.44144 & E025.64434	09/10/2015	
Nyaminyami District Area 1 (Omay)	M	KILLED	PM453354	13/11/2015	26"
Chewore Safari Area - South	M	KILLED	ST967260	25/10/2015	
Riverside Ranch	M	KILLED	35k227702	31/10/2015	24.78
Matetsi Safari Area - Unit 6	M	KILLED	18.06.55.68.25.22	03/12/2015	
Chewore Safari Area - South	M	KILLED	QN975310	06/12/2015	
Sapi Area	M	KILLED	Mtawatawa	11/06/2015	24"

7.6 POINTS SYSTEM FOR ADAPTIVELY MANAGING LION QUOTAS IN ZIMBABWE

The points system used to adaptively manage lion quotas has been developed following similar systems that have been implemented in Tanzania and northern Mozambique. The systems that are in place in Tanzania and Niassa differ slightly, but both lion quotas are set per the age of the lions harvested during the previous hunting season (Begg and Begg, 2008; Tanzania Wildlife Division 2013). The Tanzanian system is more punitive with significant quota reductions, trophy confiscation and fines for non-compliance, whereas the Niassa system is more accommodating but nevertheless can result in quota reductions if five-year-old lions are hunted. The latter was aimed at a means of accommodating the difficulty of telling five-year-old lions apart from four year olds.

After reviewing the Tanzanian and Mozambican age restriction systems and debating possible models for application in Zimbabwe, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted

by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The approach adopted by Zimbabwe recognises four as opposed to three key age categories (Table 21).

Table 21. Proposed points system for lion age restrictions and quota setting in Zimbabwe

	≥6 years	No trophy	5 years' old	4 years' old	<4 years	Failure to submit hunt return/incomplete hunt returns
For quotas of 3/more	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Quota setting process	These points are added up and divided by 3 to yield the quota for next year					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota. The key distinction of the Zimbabwean system is that the quota will not be affected if they hunt animals that are five years old. This position was adopted after considering various the population models that suggested that the hunting animals of five years of age or older is predicted to be comparatively safe from a population perspective (Whitman et al. 2007). Moreover, after reviewing aging techniques, the consensus was that professional hunters could be distinguish between lions that are five or above. The system therefore rewards operators with increased quotas if they hunt animals of six years and older, but it does not penalize them if they hunt animals of five years. Neither are they penalised if they do not shoot a lion that they have on quota, however, the quotas will be reduced if they hunt animals younger than five years or if they failed to complete hunt returns.

Lions are aged by triangulating multiple different aging characteristics, including:

- The degree of facial scarring;
- The teeth colour and degree of wear;
- The mane development (particularly regarding the shape around the ear and the mohawk);
- Through post mortem analysis of the width of the pulp cavity of the second premolar (which becomes narrower with age).

7.6.1 Results of the Adaptive Lion Quota Management System: 2013 to 2016

In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less than 5 years of age dropped overall between 2013 and 2015 (Figure 9).

In 2015 the Zimbabwe national lion hunting quota was set at 82 lions. Of this 82, only 49 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 9, 10 and 11), the recommended quota for 2016 was set at 81. In 2015 there was a marked increase in the age of lions hunted. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 9).

As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers.

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake would generate approximately US$ 2,800,000 annually. If management costs are approximately $150 km^2, then the lion safaris alone can support 18,600 km^2 of wildlife habitat in Zimbabwe.

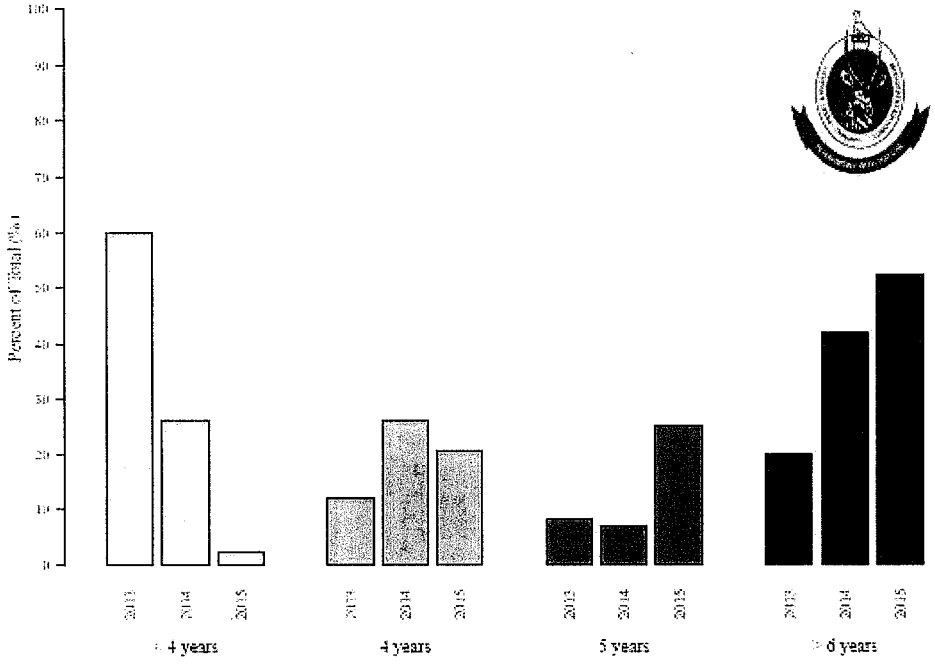


Figure 9: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

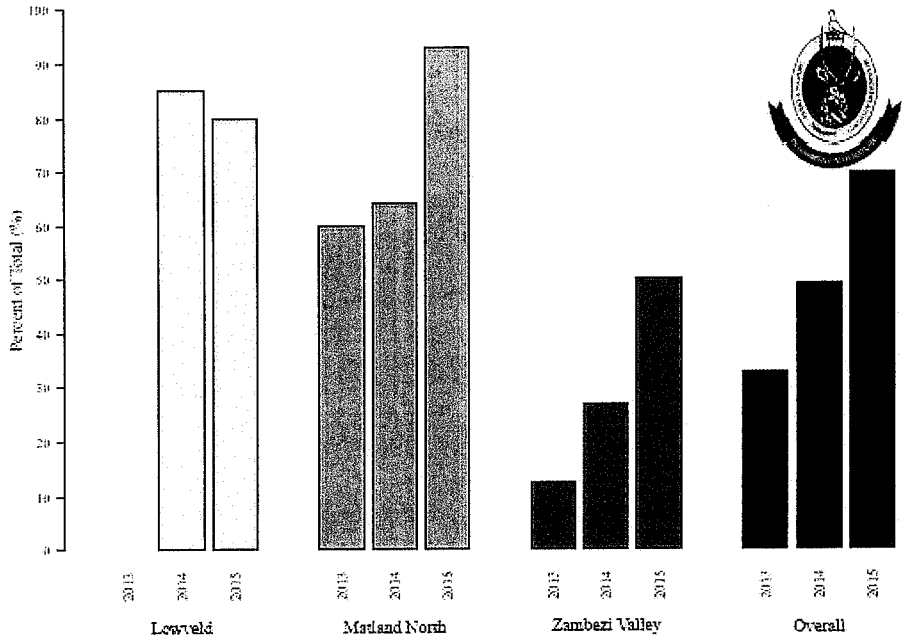


Figure 10: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

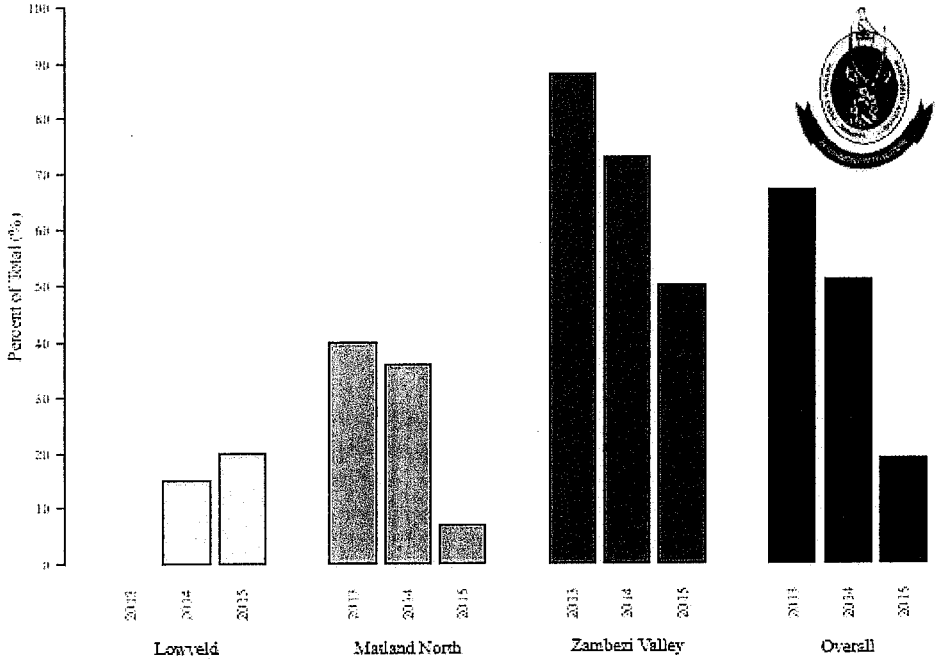


Figure 11: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

7.6.2 Case study: Safari Hunting surrounding Hwange National Park

The Hwange National Park is surrounded by hunting areas that fall under the Authority, Forestry Land, Private Land and Communal Land. The ZPWMA is responsible for setting and administrating quotas in conjunction with stakeholders for the safari areas, forestry areas, communal lands and private properties.

The Matetsi Safari Area to the north of Hwange National Park was established in the 1970s when several unsuccessful private sector mixed faming properties were expropriated, compensated and the resultant block of land turned over to safari hunting – a largely untried venture at that time on a large scale. An intensive monitoring system was set in place to gauge the effectiveness of the scheme and this continues to this day (Crossmary et al. 2013, Figure 12). The seven concessions (six given over to safari hunting) are leased on five year terms and concessionaires pay a 5 year "right to lease" fee, an annual rental, a fixed quota fee (payable if animals are shot or not) and a supplementary quota fee which allows additional animals to be bought as per need.

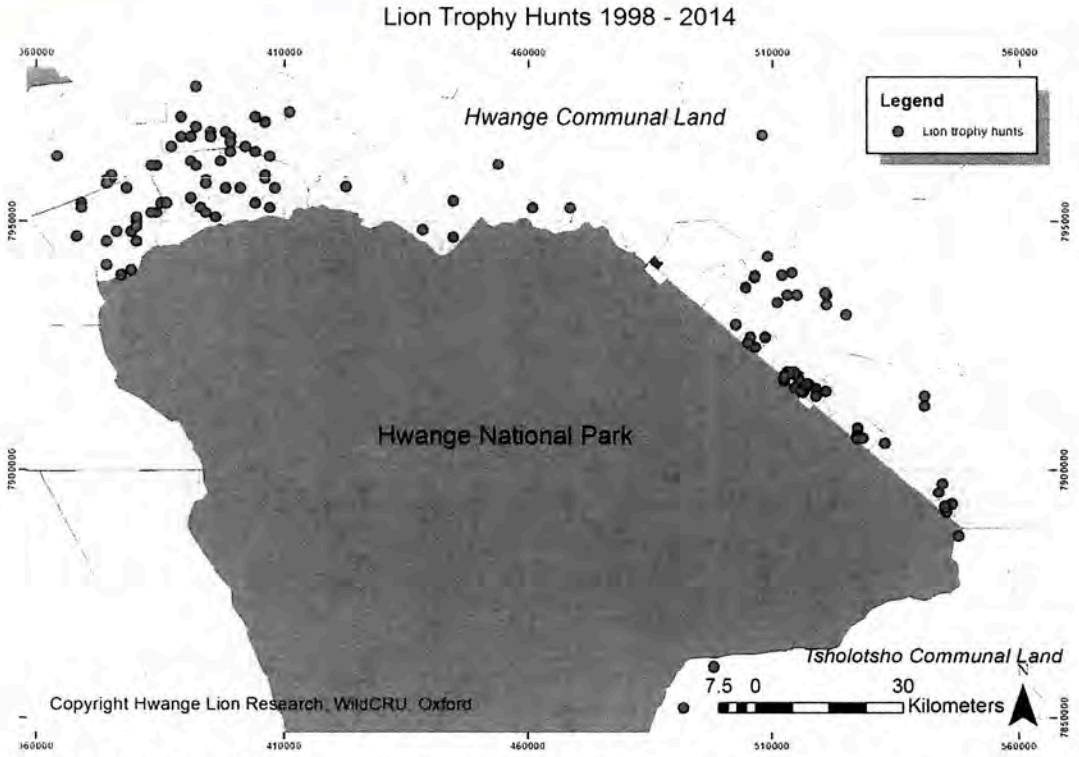


Figure 12: Record of where lion have been hunted on the land surrounding the Hwange National Park since 1998 (data extracted from the Hwange National Park Management Plan).

8 Threats and Mitigation

The consensus of the scientific and animal welfare community is that the populations of lion in Africa has declined by 43% in the last two decades, with the greatest declines having occurred in west Africa. The exception to this are the populations of southern Africa, notably South Africa, Namibia, Botswana and Zimbabwe that are home to 24- 33% of the overall population has increased (Funston et. al. 2016).

Nonetheless, as is the case in other range states, the greatest threats to lion in Zimbabwe are from habitat loss, snaring and retaliatory killings where livestock are involved.

8.1 Human-Lion Conflict

The main source of illegal killing of lions is a result of Human-Lion conflict. The human population of Zimbabwe has increased since 1960 (estimated at 13 million). There is considerable pressure to convert land to agro-pastoral production, and the pressure is expected to increase. It is not unexpected therefore that the incidence of Human-Lion conflict will increase. ZPWMA records show that 200 attacks occurred on humans and 150+ on livestock (cattle, goats, sheep, dogs etc.) were killed in 2015 (see Table 13 above).

Retaliation for these livestock losses is usually done poisoning or hunting. The exact number of lions killed in this way is difficult to assess, but may number over 50/year. These indiscriminate killings pose the most significant threat to the species, and is of major concern to the management authorities. For example, the Area Manager for Hwange National Parks reported that 6 lions were killed on the Hwange National Parks boundary in 2016, and the Authority responded to several problem animal attacks on livestock.

In accordance with the Parks and Wildlife Act of 2001 when a lion attacks a human or kills livestock, it shall be eliminated. However, despite the numerous incidents reported across the country, less than 10 lions are killed through official "problem animal control" (PAC).

8.2 Habitat Loss

Zimbabwe supports substantial populations of lions outside of its protected areas and extensive conservancies. Moreover, despite its expanding human population, many of the protected areas are still intact however, the threat to lions from habitat loss exists in the Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by an increasing human and livestock populations surrounding these areas. In these areas, habitat loss, reduction in prey populations and killing of problem lions are the major threats to long term lion survival.

Due to the large size of the protected area system in the Zambezi Valley and North West Matabeleland, threats are limited to lion range which extends into adjacent settled areas. The huge natural prey base in these protected areas, reduced killing of problem animals associated with lions preying on livestock in adjacent settled areas.

The potential and real loss of habitat and the fragmentation of range and conflicts with people in the absence of effective incentive mechanisms to maintain such habitat is probably the second greatest threat to lions after retaliatory killings. Increasing livestock numbers is reducing the available habitat in buffer areas adjacent to the protected areas, and increasing the incidents of human-lion conflicts. Lions are being more and more regarded as a liability and economic cost to rural communities. Reversing this trend is difficult under normal circumstances, and this has been made that much more difficult with the cessation of lion hunting. Integrating income from lions into rural economies, and demonstrating that lions contribute to the welfare and development of people is regarded as one strategy to mitigate against this. The involvement and empowerment of rural people in natural resource management through the CAMPFIRE programme that strives to provide economic and financial incentives through sustainable use, is one of the main driving forces behind changes in attitudes towards wildlife in communities where lion-livestock conflicts occur.

8.3 Illegal Trade in Lion Products

Very few lions are poached in Zimbabwe (not to be confused with retaliatory killings). Records, mainly from anti-poaching reports, are for impoundment of body derivatives such as skins, teeth/claws, body

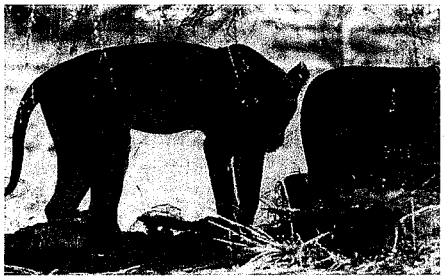
fats and bones. These may be sought after for local traditional medicinal use. Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey.

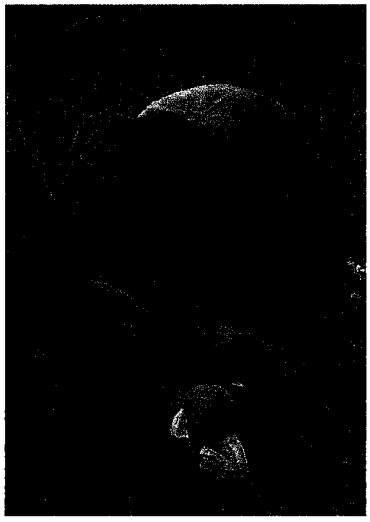
The illegal trade in lions and their products (i.e. bone trade) is very insignificant. There are no records of people found in possession of illegally acquired lion specimens in Zimbabwe, and anyone found in possession of illegally acquired lion specimens is required to pay a fine US$5000 or faces a mandatory jail sentence. On conviction for lion poaching, courts may ask the accused to pay a compensation fee of US$20 000.

8.4 Bushmeat Poaching

Poaching for bushmeat is an important livelihood component of rural communities in Zimbabwe and a vast literature exists on this subject (see Lindsey et. al. 2015a and 2015b). Poverty stands as the major driver of illegal hunting, and the livelihoods of illegal hunters have been augmented considerably through revenue generated from bushmeat sales. Illegal hunters use bushmeat both for supplementing household protein and for economic gain.

Poaching for bushmeat does not seem to have impacted directly the overall lion's status in Zimbabwe, but more research is needed to fully understand its impact on lion. However, lions are often inadvertently caught in snares set for animals targeted by bushmeat poachers. Where possible, lions caught in snares are captured and treated (Figure 13).





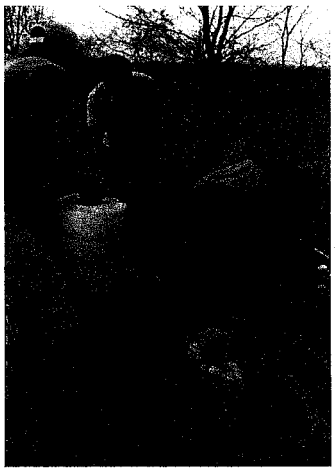


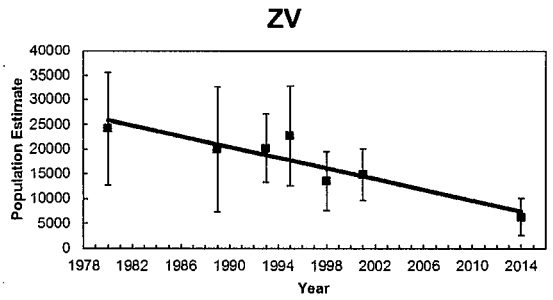
Figure 13: Young lioness being treated by the Victoria Falls Conservation Trust after a snare was removed from around the chest (Source: S. Edwards)

8.5 PREY ABUNDANCE

The extent to which bushmeat poaching outside of the Parks Estate is depleting lion's prey is not known. Prey abundance is still high in all protected areas where lions occur, and as abundance of prey species is highly correlated with lion density (Hayward et al 2007), data on the main prey species for lion, extracted from the 2014 aerial surveys of elephants and other large herbivores (Dunham et. al., 2015, 2015a, b, c, d) are shown in below (ZV = Zambezi Valley, NW Mat = North West Matabeleland).

The overall long term trends show that most population status of most prey species has declined in recent years. There are many possible explanations for these declines, but probably the most critical factor has been droughts, especially that experienced in 2005.

Buffalo


ZV
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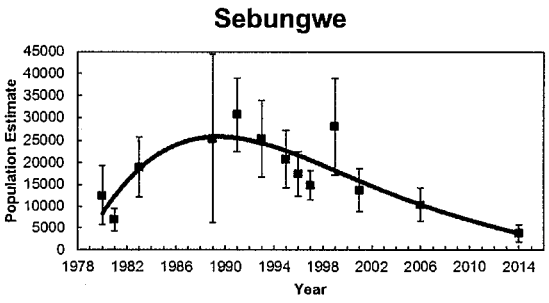
35000
30000
25000
20000
15000
10000
5000
0
1978 1982 1986 1990 1994 1998 2002 2006 2010 2014
Year


Sebungwe
Population Estimate
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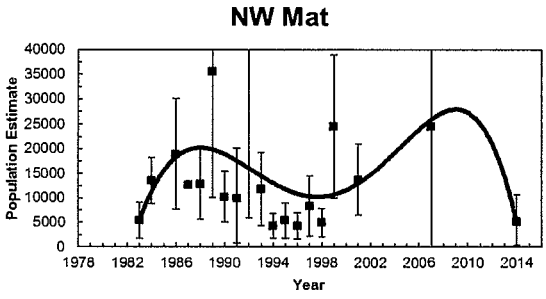
30000
25000
20000
15000
10000
5000
0
1978 1982 1986 1990 1994 1998 2002 2006 2010 2014
Year


NW Mat
Population Estimate
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25000
20000
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10000
5000
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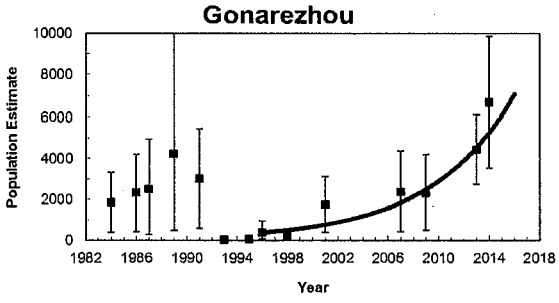
1978 1982 1986 1990 1994 1998 2002 2006 2010 2014
Year


Gonarezhou
Population Estimate
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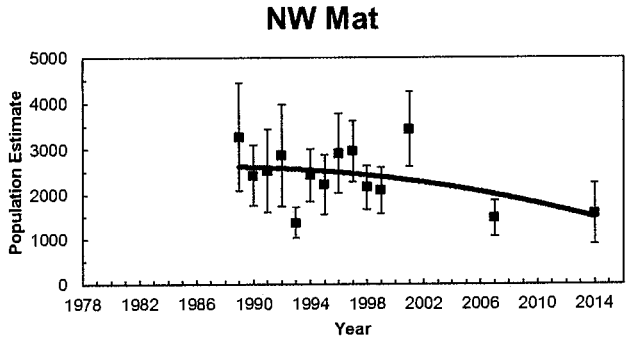
8000
6000
4000
2000
0
1982 1986 1990 1994 1998 2002 2006 2010 2014 2018
Year

Giraffe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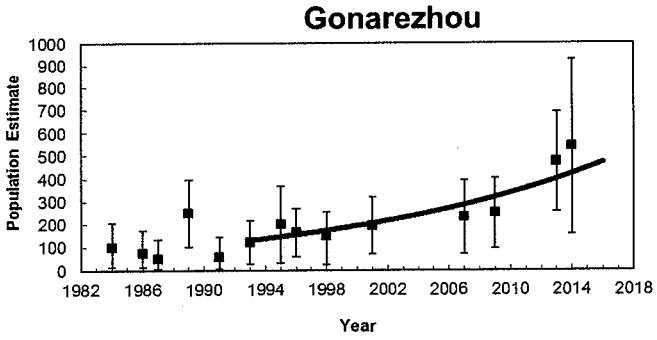
Year


Gonarezhou
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600
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200
100
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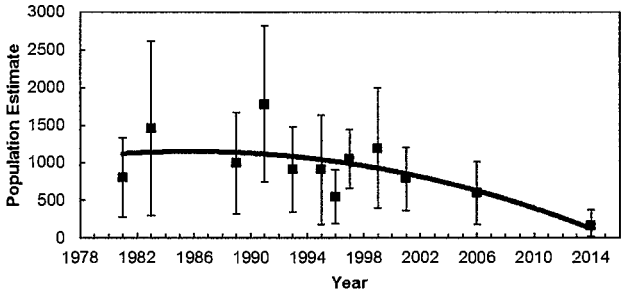
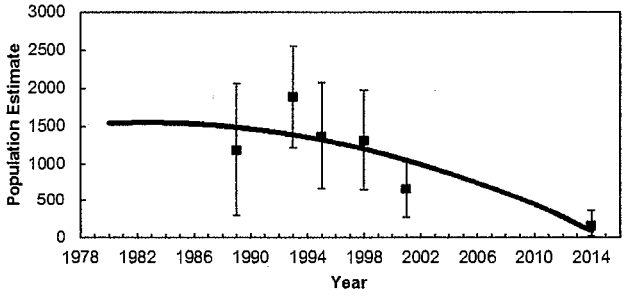
2006
2010
2014
2018
Year

Sable

Sebungwe



ZV



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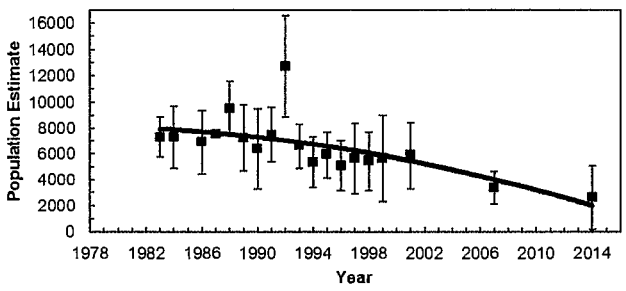

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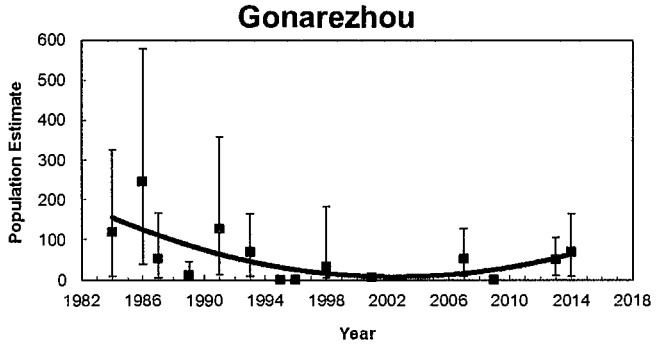
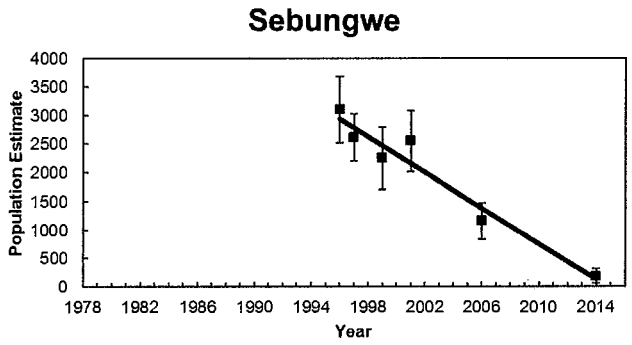


Kudu


Sebungwe
Population Estimate
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3000
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2000
1500
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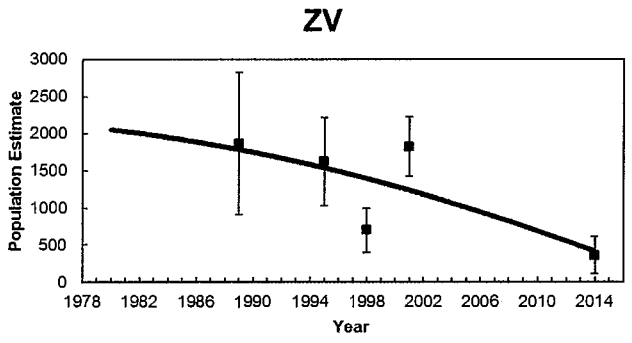
1978 1982 1986 1990 1994 1998 2002 2006 2010 2014
Year


ZV
Population Estimate
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2000
1500
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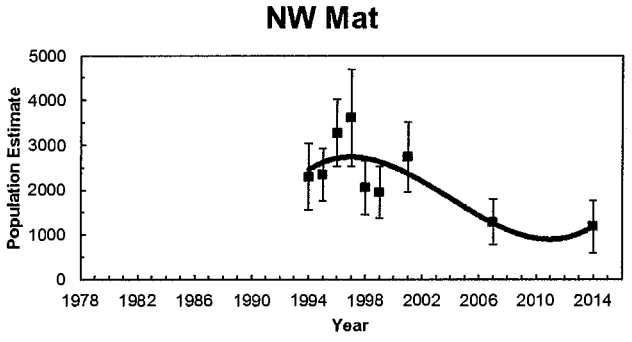
1978 1982 1986 1990 1994 1998 2002 2006 2010 2014
Year


NW Mat
Population Estimate
5000
4000
3000
2000
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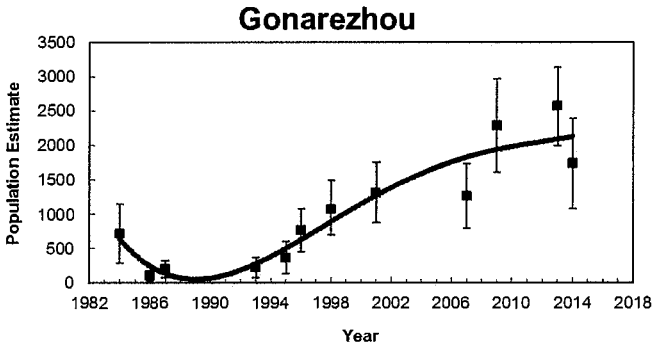
0
1978 1982 1986 1990 1994 1998 2002 2006 2010 2014
Year


Gonarezhou
Population Estimate
3500
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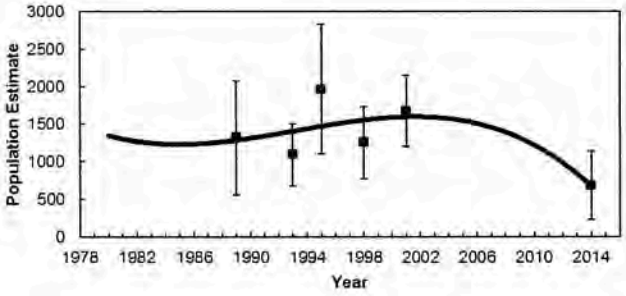
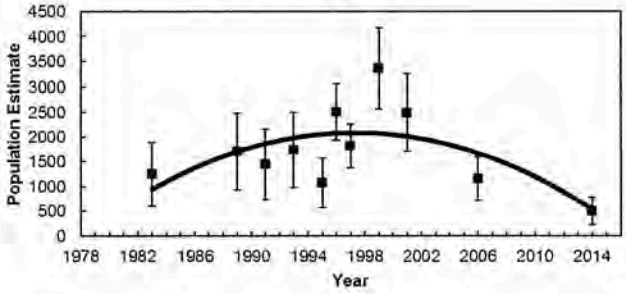
1982 1986 1990 1994 1998 2002 2006 2010 2014 2018
Year

Zebra

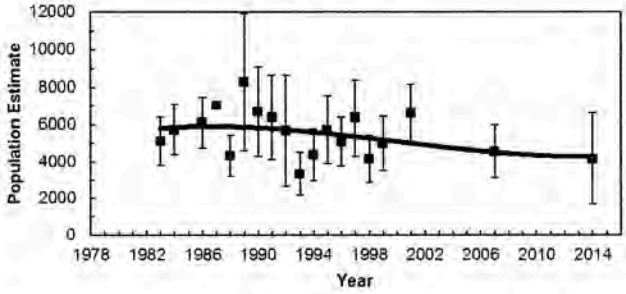
ZV



Sebungwe



NW Mat



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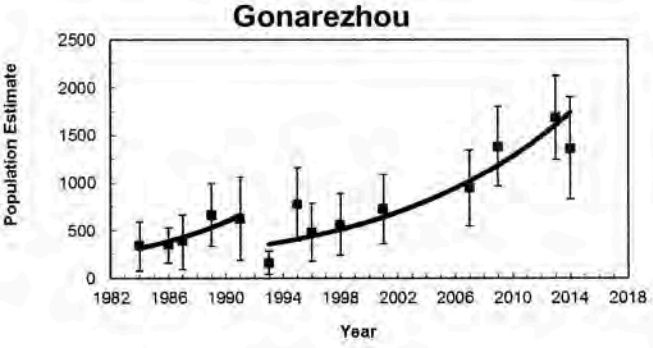
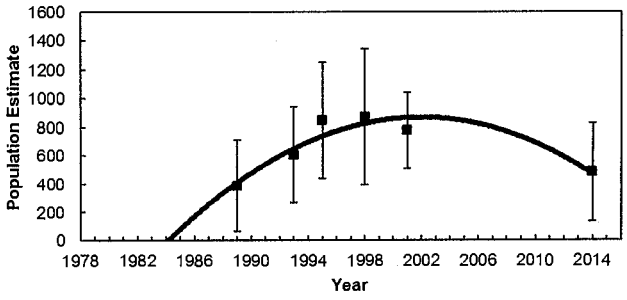
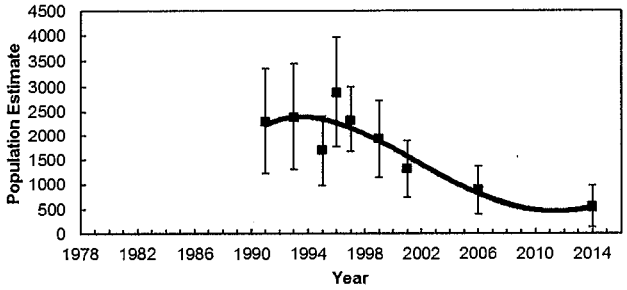


Waterbuck

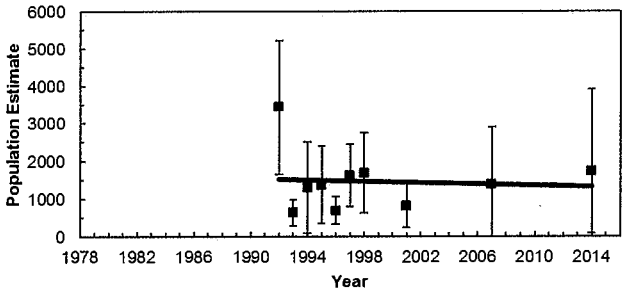
ZV



Sebungwe



NW Mat



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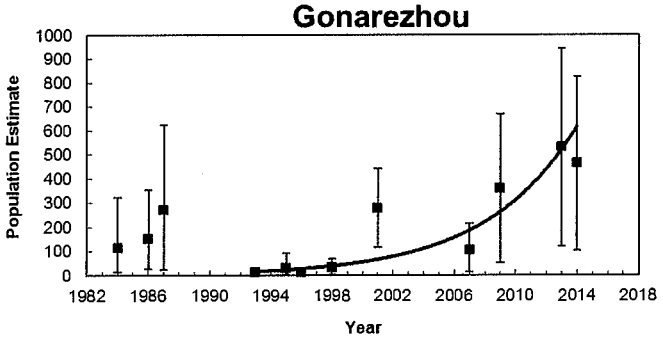

9 Assessment of the Enhancement and Non-Detriment Findings

The assessment of the enhancement and non-detrimental findings for lion in Zimbabwe is presented here using the "IUCN SSC GUIDING PRINCIPLES ON TROPHY HUNTING AS A TOOL FOR CREATING CONSERVATION INCENTIVES. VER. 1.0. IUCN SSC (2012)" as a guide. Zimbabwe recognises the importance of these principles to guide and manage trophy hunting as a legal, regulated conservation activity which provides a critical tool to secure a sound social, economic and ecological conservation scenario.

Biological Sustainability: Trophy hunting can serve as a conservation tool when it:

	Principle	Remarks
1	***Does not contribute to long-term population declines of the hunted species or of other species sharing its habitat, noting that a sustainably harvested population may be smaller than an unharvested one***	Considering the latest available estimate of lion population size in Zimbabwe (1,800 – 2,000), trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restriction rules on lion hunting. This low offtake is sustainable and generates significant financial and other benefits to ZPWMA, Communities and Private Sector.
2	***Does not substantially alter processes of natural selection and ecosystem function; that is, it maintains "wild populations of indigenous species with adaptive gene pools." This generally requires that hunting offtake produces only minor alterations to naturally occurring demographic structure. It also requires avoidance of breeding or culling to deliberately enhance population-genetic characteristics of species subject to hunting that are inconsistent with natural selection***	Safari hunting in does not substantially alter natural selection or ecosystem processes. The limited quota, as further limited by age restrictions, ensures that hunting offtakes do not negatively affect natural processes. This age-based policy was adopted in part to mitigate any social or population impacts from limited safari hunting. (Whitman et al. 2004).
3	***Does not inadvertently facilitate poaching or illegal trade of wildlife***	Safari hunting in Zimbabwe does not facilitate poaching or illegal trade. Poaching and illegal trade in lion products is currently very low suggesting that the existence of licensed, regulated hunting is helping control poaching and not facilitating it. Hunting operators are in the frontlines against poaching, and are obligated through their concession lease agreements to assistance with anti-poaching. Operators spend significant resources on this, and work in close cooperation with the ZPWMA to combat all forms of illegal wildlife trade. Even where anti-poaching is not a legal prerequisite, operators fund their own anti-poaching teams and support government rangers and community scouts e.g. in Sengwa and Dande Safari Area

	Principle	Remarks
4	***Does not artificially and/or substantially manipulate ecosystems or their component elements in ways that are incompatible with the objective of supporting the full range of native biodiversity***	Hunting in Zimbabwe has created financial incentives for the development and retention of wildlife across Safari Areas, Forestry Areas, Communal CAMPFIRE Areas and private Conservancies thereby supporting biodiversity over 145,000km^2 where hunting is a primary land use. Hunting areas on private and communal land outside of the protected areas also serve as buffer zones for many national parks and safari areas which would be converted to other land uses if these were abandoned.

Net Conservation Benefit: Trophy hunting can serve as a conservation tool when it

	Principle	Remarks
1	***Is linked to identifiable and specific parcels of land where habitat for wildlife is a priority (albeit not necessarily the sole priority or only legitimate use); and on which the "costs of management and conservation of biological diversity [are] internalized within the area of management and reflected in the distribution of the benefits from the use"***	Zimbabwe has identified Safari Areas within the Parks Estates where maintaining habitats and wildlife populations is the priority. These gazetted protected areas cover approximately 17,000km^2 where, without safari hunting, it would be difficult to secure and maintain natural ecosystems and prey bases for lions. In addition to these areas, lion occur on 66% (approximately 11,000km^2) of the land set aside as Conservancies. The operational and law enforcement costs incurred by hunting companies on a yearly basis ranges from US$300,000 to US$500,000 per hunting concession, which includes the expense of camps, salaries, anti-poaching, fuel, community assistance, etc. Many of the government's costs of maintaining Safari Areas are transferred to the private sector through the obligations of their concession agreements. Revenues from hunting in communal CAMPFIRE areas are used to support a range of social services (e.g. schools, clinics, irrigation schemes etc.) while operators cover the costs of anti-poaching, maintenance and development, and contributions to communities living nearby (e.g. through boreholes, grinding mills etc.).

		In private hunting areas and conservancies, the costs and benefits of wildlife in the area are internalized and distributed within the area of management. Critically, most of the Conservancies have elected to manage and conserve endangered species, such as black rhino, and offset the costs of this by conducting sustainable hunting of lion and other key trophy species.
2	***Produces income, employment, and/or ather benefits that generate incentives for reduction in pressures on populations of target species, and/or help justify retention, enhancement, or rehabilitation of habitats in which native biodiversity is prioritized. Benefits may create incentives for residents to co-exist with such problematic species as large carnivores, herbivores competing for grazing, or animals considered to be dangerous or a threat to the welfare of humans and their personal property***	Hunting produces direct and indirect income, employment, and other benefits that generate incentives that reduce the threats to wildlife populations. Approximately US$44 million accrued to the country from the revenues of trophy hunting over the last two years. This could have been 5% higher if it were not for restrictions on the export of elephant and lion trophies. This revenue pays for the daily wildlife conservation work in all sectors of the wildlife industry, including research projects, surveys, anti-poaching, and other services. Of this amount, approximately 20% is paid directly to the ZPWMA which is then used to support its management activities, including anti-poaching budgets. Local communities benefit from hunting income through leasing the right to hunt and the sale of trophy fees in CAMPFIRE areas as well as from voluntary contributions and meat. Over the last 6 years, payments from hunting operations generated approximately US$16 million. The nature of the hunting industry does not require large numbers of people to be employed. Nonetheless, the average hunting company employs approximately 80 people on a permanent basis and 20 on a seasonal basis. This equates to approximately 3,000 people who would not otherwise secure any form of employment because of the lack of opportunities in the remote areas where hunting takes place.
3	***Is part of a legally recognized governance system that supports conservation adequately and of a system of implementation and enforcement capable of achieving these governance objectives***	All wildlife species in Zimbabwe, including the African lion, are protected under the Parks and Wildlife Act of 1996 (Chapter 20:14) as amended by Act Number 19 of 2001 which came into operation on the 1st of June 2002 through a Statutory Instrument 144C of 2002. The Act that was originally passed by Parliament in 1975 was a unique move in Africa, if not globally, that promoted the rapid development of the country's wild life industry and lead to the partial

		extension of the principle to the Communal Lands through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) in the 1980s. The Act provided a legal basis for the devolution of Authority through granting Appropriate Authority Status to the communal areas to manage the wildlife resources for their own benefit. The Act was subsequently revised in 1996 and 2001 with the latest revision paving the way for the establishment of the current Parks and Wildlife Management Authority to replace the former Department of National Parks and Wild Life Management. Following the introduction of the Parks and Wild Life (General) (Amendment) Regulations, 1998 (No.2), i.e. Statutory Instrument 26 of 1998, the administration of the wildlife industry experienced increasing centralisation of controls on wildlife management and utilisation on alienated and communal land. The Parks and Wildlife Management Authority is mandated by the Parks and Wildlife Act [Chapter 20:14], with the responsibility of conserving Zimbabwe's wildlife heritage through effective, efficient and sustainable protection and utilisation of natural resources for the benefit of present and future generations. The Authority was established to allow it to retain the revenue that it generates to fund its operations and thereby reducing its dependence on Treasury. This entailed introducing a commercial dispensation and putting in place effective revenue generation and financial management systems. The ZPWMA has the mandate to manage the entire wildlife population of Zimbabwe, whether on state, private and communal land.

Socio-Economic-Cultural Benefit

	Principle	10 Remarks
1 1	***Respects local cultural values and practices (where "local" is defined as sharing living space with the focal wildlife species), and is accepted by (and preferably, co-managed and actively supported by) most members of the local community on whose land it occurs***	Zimbabwe has promoted the CAMPFIRE programme that requires safari operators to work closely with the Wards and villages in the concession areas how to use the contributions from hunting to implement community and infrastructure development and projects. There are currently 33 CAMPFIRE programmes in Zimbabwe but only 13 of these are dependent on income from hunting that is used to invest in conservation work and community development services.
2	**Involves and benefits local residents in an equitable manner, and in ways that meet their priorities**	The CAMPFIRE programme is the foundation upon which the community based conservation system in Zimbabwe is based, and is seen as one of the key components of rural development. The CAMPFIRE programme is critical in areas that are adjacent to the national parks and safari areas since they provide a means to support wildlife and critical habitats outside of the protected areas.
3	***Adopts business practices that promote long-term economic sustainability***	All Rural District Councils and Wards that support CAMPFIRE Programmes have established committees that have the authority to negotiate and enter into contracts with the private sector for both consumptive and non-consumptive agreements. Over the last 6 years, the six key CAMPFIRE districts have generated approximately $2,802,077/year. Hunters from USA contribute 51% and Europe 31% of this income. Income to Districts from a variety of wildlife related revenue streams is approximately $2,510,783/year, and 74% of this income is used to support general administrative and management costs, including law enforcement. At the Ward level,55% the income received (approximately $2.9 million/year) is used to support a variety of social services that benefit a large proportion of the local community.

Adaptive Management: Planning, Monitoring, and Reporting

	Principle	Remarks
1	***Is premised on appropriate resource assessments and/or monitoring of hunting indices, upon which specific quotas and hunting plans can be established through a collaborative process. Optimally, such a process should (where relevant) include local communities and draw on local/indigenous knowledge. Such resource assessments***	Zimbabwe implements an adaptive quota setting quota system that uses inputs from monitoring data and input from a variety of stakeholders including ZPWMA field and research staff, local communities, hunting operators, and independent biologists. Quotas are set based on population estimates or trend

	(examples might include counts or indices of population performance such as sighting frequencies, spoor counts) or hunting indices (examples might include trophy size, animal age, hunting success rates and catch per hunting effort) are objective, well documented, and use the best science and technology feasible and appropriate given the circumstances and available resources	analyses, monitoring data, hunt return data, research work and indices as may be reflected in various reports by field personnel. For lions, specifically, the ZPWMA together with the Safari Operators Association (SOAZ), the Zimbabwe Professional Hunters Association (ZPHGA) and invited independent scientists (such as Panthera) review the returns from the current hunting season and assign points as per the lion aging criteria. The overall quotas allocated and actual offtake have been reduced in recent years as a precautionary measure, including implementing moratoriums in some regions where lion densities have declined. These measures, i.e., age, population trends, maximum overall numbers and levels of utilisation has resulted in lower quotas thus underlining Zimbabwe's commitment to sustainable hunting.
2	***Involves adaptive management of hunting quotas and plans in line with results of resource assessments and/or monitoring of indices, ensuring quotas are adjusted in line with changes in the resource base (caused by ecological changes, weather patterns, or anthropogenic impacts, including hunting offtake)***	Quotas are set adaptively in line with the results of monitoring trends and on regulatory compliance. If an underage lion is harvested, the quota for that area is removed in the next season to allow the population to age and to penalize the non-compliance. In this way, Zimbabwe ensures responsible and sustainable offtakes that have limited impact on the lion population.
3	***Is based on laws, regulations, and quotas (preferably established with local input) that are transparent and clear, and are periodically reviewed and updated***	Safari hunting in Zimbabwe is regulated through the National Parks and Wildlife Act and supporting Regulations that specify when, where and how animals are hunted. Both the professional hunters and the hunting client are licensed in terms of these regulations, and all returns are lodged electronically and tracked through the Reserve Bank TRAS-2 system. As described above, quotas are established in a transparent and participatory way.
4	***Monitors hunting activities to verify that quotas and sex/age restrictions of harvested animals are being met***	The monitoring of the lion hunting is carried out through the implementation of a specific database and a specific safari return form. All hunting permits issued by (and compulsorily returned to) the ZPWMA are registered on a specific database that has been developed under the auspices of the Exchange Control Division of the Reserve Bank that records all parameters related to hunting safaris, including records of lion hunting. The database is accessible to the ZPWMA who can extract reports on all lion hunting activities for all areas in the country.

		Since 2013, all professional hunters conducting lion hunting safaris are required to fill in the return form for both successful and unsuccessful safaris that captures a broad range of general information on the safari (client name, duration, date, payments etc. For the successful lion hunting safaris, additional information related to hunting effort and success, trophy skull measures (total length and width) and specified photographs are taken of the physical features (mane etc.) and upper and lower jaws. These return forms and trophy photographs are compulsory. No CITES export permit can be issued without compliance. All data forms are reviewed by the ZPWMA together with a committee appointed by the SOAZ and ZPHGA to ensure the offtakes and subsequent exports are not detrimental to the survival of the species. Zimbabwe also requires that a ZPWMA ranger accompany all lion safaris both on state land and private land.
5	***Produces reliable and periodic documentation of its biological sustainability and conservation benefits (if this is not already produced by existing reporting mechanisms).***	The Exchange Control Division of the Reserve Bank publishes a detailed report that summarises all data related to sport hunting. This includes country of origin of clients, gross income from daily rates and trophy fees (by company), average trophy and safari values, and the contribution of key species to the overall income generated through hunting. The ZPWMA also produces annual reports that highlight the performance of the hunting industry, listing the challenges that it faces. It also submits periodic reports to CITES.

Accountable and Effective Governance

	Principle	Remarks
1	***Is subject to a governance structure that clearly allocates management responsibilities***	The governance structure is described in the Parks and Wildlife Act and its subsidiary regulations that clearly provides for institutional arrangements and administration defining the management responsibilities within the relevant Government Authority.
2	***Accounts for revenues in a transparent manner and distributes net revenues to conservation and community beneficiaries according to properly agreed decisions;***	The equitable distribution of costs and benefits take into consideration the role of stakeholders in relation to the land category. Benefit sharing to communities under the CAMPFIRE programme is determined through an approved ratio that

		channels 55% of all income from hunting to the Ward level. This institution is monitored at the local level by the Rural District Councils that guide Ward Wildlife Committees with respect to community projects and services. At national level this is monitored by Ministry of Rural Development, Preservation and Promotion of Culture and Heritage Safari operators contribute substantially and voluntarily, over and above the prescribed fixed contribution, especially where this involves anti-poaching efforts and community developments. They provide funding, equipment and the technical expertise for repairs, transportation, and other social services (schools, boreholes). In addition, hunting companies collaborate with both ZPWMA and District anti-poaching teams to remove snares, participate in serious wildlife crime investigations and arrest poachers.
3	***Takes all necessary steps to eliminate corruption;***	Anti-corruption efforts in Zimbabwe are governed by the following legislation: • The Prevention of Corruption Act (1983); • Public Service Act (1995); • The Ombudsperson Amendment Act (1997); • Anti-Corruption Commission Bill (2004); • The Criminal law (Codification and Reform) Act (2004); • Bank Use Promotion and Suppression of Money Laundering Act (2004); • Criminal Procedure and Evidence Amendment Act (2004); and • Criminal Law (Codification and Reform) Act of 2006 The Zimbabwean Anti-Corruption Commission (ACC) was established after the passing of the Anti-Corruption Commission Bill in June 2004. The Commission is a signatory to the Southern Africa Development Community (SADC) Protocol as well as the African Union (AU) and United Nations Convention on Anti-Corruption.
4	***Ensures compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.***	The CITES Management Authority of Zimbabwe, the ZPWMA, ensures compliance of safari hunting to CITES guidelines and provisions.

Bauer, H. Chardonnet, P. and Kristin Nowel, l. 2005. Status and distribution of the lion (*Panthera leo*) in East and Southern Africa. Background paper for the East and Southern African Lion Workshop, Johannesburg, 2006. IUCN, Pretoria.

Bauer, H. and Van der Merwe, S. 2004. Inventory of free-ranging lions *Panthera leo* in Africa. 26–31 pp. Available at: WOS:000220283600007.

Bauer, H., Chapron, G., Nowell, K., Henscheld, P., Funston,P.,Hunter, L.T.B., Macdonald, D.W. and Packer, C. 2015. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. www.pnas.org/cgi/doi/10.1073/pnas.1500664112

Begg, C. and Begg, K. 2008. Trophy monitoring of lion and leopard trophies in Niassa National Reserve, Mozambique: 2007 hunting season. Ratel Trust and SRN, Mozambique.

Chitauro. 2016. Status of the hunting sector in Zimbabwe. Internal report prepared by the Director of Exchange Control om behalf of the Reserve Bank of Zimbabwe. Unpublished.

Creel, S. and Creel, N.M. 1997. Lion density and population structure in the Selous Game Reserve: evaluation of hunting quotas and offtake. Afr. J. Ecol. Volume 35, pages 83 - 93

Crosmary, W.G., Loveridge, A.J., Ndaimani, H., Lebel, S., Booth, V., Côté, D. and Fritz, H. 2013. Trophy hunting in Africa: long-term trends in antelope horn size. Animal Conservation •• (2013) ••–•• © 2013 The Zoological Society of London.

Davidson, Z. and Loveridge, A. 2005. Population Estimation by Spoor Counts with Calibration Using Known Lion Density. Status report of the Gwaai ICA; Wildlife Conservation Research Unit, Oxford University.

Davidson, Z. and Romanach, S. 2007. Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. Report for SVC, WildCRU and University of Zimbabwe, TREP.

du Preez, B., Groom, R., Mufute, O., Mandisodza-Chikerema, R. and Booth, V. 2016. Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe. Report prepared by the Bubiana Valley Conservation Research.

Dunham, K.M. Mackie, C.S. and Nyaguse, G. 2015a. Aerial Survey of Elephants and other Large Herbivores in the Zambezi Valley (Zimbabwe): 2014. Great Elephant Census, Vulcan Inc., Seattle, WA, USA. 118 pp.

Dunham, K.M., Mackie, C.S., Nyaguse, G. and Zhuwau, C. 2015b. Aerial Survey of Elephants and other Large Herbivores in north-west Matabeleland (Zimbabwe): 2014. Great Elephant Census, Vulcan Inc., Seattle, WA, USA. 126 pp.

Dunham, K.M., Mackie, C.S., Nyaguse, G. and Zhuwau, C. 2015c. Aerial Survey of Elephants and other Large Herbivores in the Sebungwe (Zimbabwe): 2014. Great Elephant Census, Vulcan Inc., Seattle, WA, USA. 111 pp.

Dunham, K.M. & van der Westhuizen, H.F. 2015d Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Save Valley Conservancy (Zimbabwe): 2014. Great Elephant Census, Vulcan Inc., Seattle, WA, USA. 115 pp.

Funston, P.J., Herrmann, E., Babupi, P., Kruiper, A., Jaggers, H., Masule, K. and Kruiper, K. 2001. Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (Book chapter).

Funston, P., Henschel, P., Hunter, L., Lindsey, P., Nowak, K., Vallianos, C. and Wood, K. 2016. Beyond Cecil: Africa's Lions in Crisis. Panthera and WildAid, New York and San Francisco.

Groom, R. 2008. Carnivore densities in the Savé Valley Conservancy; Results of the 2008 spoor survey. Report for Savé Valley Conservancy Technical Advisory Committee.

Groom, R. J. 2009. Carnivore Densities in Gonarezhou National Park: Results of the May/June 2009 Spoor Survey. Lowveld Wild Dog Project.

Groom, R.J. 2010. The abundance and conservation status of lions (*Panthera leo*) and spotted hyenas (*Crocuta crocuta*) in Gonarezhou National Park, Zimbabwe. Results of the 2010 call-up survey. African Wildlife Conservation Fund, unpublished report.

Groom, R.J., Funston, P.J. and Mandisodza, R. 2014. Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx http://journals.cambridge.org.

Groom, R. J. and Watermeyer, J. 2015. Carnivore Densities in Gonarezhou National Park. Results of the 2015 Spoor Survey. Gonarezhou Predator Project

Groom, R. J. and Watermeyer, J. 2015a. Carnivore Densities in the Savé Valley Conservancy. Results of the 2015 Spoor Survey & Wild Dog Monitoring Project. African Wildlife Conservation Fund

Hayward, M. W., O'Brien, J., and Kerley, G.I.H., 2007. Carrying capacity of large African predators: predictions and tests. Biological Conservation, 139(1), 219-229.

IUCN/SSC. 2012. IUCN/SSC Guiding principles on trophy hunting as a tool for creating conservation incentives. Ver. 1.0. IUCN, Gland. http://cmsdata.iucn.org/downloads/iucn_ssc_guiding_principles_on_trophy_hunting_ver1_09aug2012.pdf

Loveridge, A.J. Searle, A.W., Murindagomo, F., Macdonald, F.W. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation 134: 548 – 558

Lindsey, P. A., Balme, G., Becker, M., Begg, C., Bento, C., Bocchino, C., Dickman, A., Diggle, R. W., Eves, H., Henschel, P., Lewis, D., Marnewick, K., Mattheus, J., McNutt, J. W., McRobb, R., Midlane, N., Milanzi, J., Morley, R., Murphree, M., Opyene, V., Phadima, J., Purchase, G., Rentsch, D., Roche, C., Shaw, J., van der Westhuizen, H., van Vliet, N. and Zisadza-Gandiwa, P. 2015a. The bushmeat trade in African savannas: Impacts, drivers, and possible solutions. FAO/Panthera/Zoological Society of London/WCS Report, Harare. 79 pages.

Lindsey, P., Taylor, W.A., Nyirenda, V., Barnes, L., 2015b. Bushmeat, wildlife-based economies, food security and conservation: Insights into the ecological and social impacts of the bushmeat trade in African savannahs. FAO/Panthera/Zoological Society of London/SULi Report, Harare. 58 pages.

Miller, J.R.B., Balme, G., Lindsey, P.A., Loveridge, A.J., Becker, M.S., Begg, C. Brink, H., Dolrenry, S., Hunt, J.E., Janssoni, I., Macdonald, D.W., Mandisodza-Chikerema, R.L., Cotterill, O.L., Packer, C., Rosengren, D., Stratford, K., Trinkel, M., White, P.A., Winterbach, C., Winterbach, H.E.K. and Funston, P.J. 2016. Aging traits and sustainable trophy hunting of African lions. Biological Conservation 201 (2016) 160–168.

Mills, M.G.L. , Biggs, H.C. and White, I.J. 1995. The relationship between rainfall, lion predation and population trends in African herbivores. Wildl. Res. 22: 75–88

Stander, P.E. (1998) Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. Journal of Applied Ecology, 35, 378-385

Seymour-Smith, J. L. and Loveridge, A. J. 2015. Mana Pools National Park Predator Survey July – October 2015.

Whitman, K.L., Starfield, A.M., Quadling, H. and Packer, C. 2007. Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions. Conservation biology: The Journal of the Society for Conservation Biology, 21(3): 591–601.

ZPWMA, 2006. Conservation Strategy and Action Plan for the Lion (*Panthera leo*) in Zimbabwe. Zimbabwe Parks and Wildlife Management Authority, Ministry of Environment and Tourism, Harare, Zimbabwe. 19 pages.

ZPWMA, 2014. Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe.

ZPWMA, 2016. Hwange National Park Management Plan 2016 – 2016. Prepared by African Wildlife Foundation on behalf of the Zimbabwe Parks and Wild Life Management Authority, Harare.

12 Appendices

12.1 Annex I: Summary of National Parks Estate, Forestry, Communal and Private Land where lion are known to occur

1. National Parks Estate

Type of Land	Name of Park	District	Area (hectares)	Presence of lion
NP	Chizarira	Binga	191,000	Yes
NP	Gonarezhou	Chiredzi	505,000	Yes
NP	Matusadonha	Nyaminyami	140,700	Yes
NP	Chimanimani	Chimanimani	17,110	No
NP	Mana Pools	Hurungwe	219,600	Yes
NP	Kazuma Pan	Hwange	31,300	Yes
NP	Hwange	Hwange	1,465,100	Yes
NP	Victoria Falls "A"	Hwange	1,904	No
NP	Victoria Falls "B"	Hwange	436	No
NP	Zambezi	Hwange	56,010	Yes
NP	Rhodes Nyanga	Nyanga	47,150	Migratory
NP	Rhodes Matopos	Matobo	42,400	No
Total Area National Parks (ha)			**2,717,710**	
Botanical Gardens	Pioneer Reserve	Beitbridge	38	No
Botanical Gardens	Tolo River Reserve	Beitbridge	44	No
Botanical Gardens	South Camp Reserve	Beitbridge	26	No
Botanical Gardens	Chisekera Hot Springs	Chiredzi	95	No
Botanical Gardens	Mawari Raphia Palm	Mt. Darwin	34	No
Botanical Gardens	Tingwa Raphia Pan	Mt. Darwin	290	No
Botanical Gardens	Haroni Forest	Chimanimani	20	No
Botanical Gardens	Rusitu Forest	Chimanimani	150	No
Botanical Gardens	Sebakwe Acacia Karoo	Kwekwe	60	No
Botanical Gardens	Sebakwe Great Dyke	Kwekwe	165	No
Botanical Gardens	Sebakwe Mountain Acacia	Kwekwe	53	No
Botanical Gardens	Mazowe "A"	Harare	43	No
Botanical Gardens	Mazowe "B"	Harare	3	No
Botanical Gardens	Bunga Forest	Mutare	495	No
Botanical Gardens	National Botanic Garden	Harare	67	No

Type of Land	Name of Park	District	Area (hectares)	Presence of lion
Botanical Gardens	Vumba Botanic Garden	Mutare	200	No
Botanical Gardens	Ewanrigg Botanic Garden	Goromonzi	286	No
Total Area of Botanical Gardens and Botanical Reserves:			**2,069**	
Sanctuary	Maninii Pan	Chiredzi	300	No
Sanctuary	Melsetter Eland	Chimanimani	1,800	No
Sanctuary	Mbaze Pan	Nkayi	40	No
Sanctuary	Nyamanyetsi (Nyamanechi)	Guruve	2,840	No
Sanctuary	Mushandike	Masvingo	12,900	No
Sanctuary	Rhodes - Bulawayo	Matobo	1,100	No
Total Area Sanctuaries			**18,980**	
Safari Area	Tuli	Beitbridge and Gwanda	41,600	Yes
Safari Area	Chete	Binga	108,100	Yes
Safari Area	Chipinga (Chipinge)	Chipinge	26,100	No
Safari Area	Malapati (Malipati)	Chiredzi	15,400	Yes
Safari Area	Chinsa	Gokwe	171,300	Yes
Safari Area	Hartley (Chegutu)	Chegutu	44,500	No
Safari Area	Charara	Kariba and Hurungwe	169,200	Yes
Safari Area	Hurungwe	Hurungwe	289,400	Yes
Safari Area	Doma	Makonde	94,500	Yes
Safari Area	Umfurudzi	Shamva	76,000	No
Safari Area	Dande	Guruve	52,300	Yes
Safari Area	Chelvore (Chewore)	Hurungwe	339,000	Yes
Safari Area	Sapi	Hurungwe	118,000	Yes
Safari Area	Deka	Hwange	51,000	Yes
Safari Area	Matetsi	Hwange	295,500	Yes
Total Area of Safari Areas:			**1,891,900**	
Recreational	Chibwatata	Binga	6	No
Recreational	Kavira	Binga	50	No
Recreational	Lake Kariba	Binga, Nyaminyami and Hwange	287,200	Yes

Type of Land	Name of Park	District	Area (hectares)	Presence of lion
Recreational	Ngezi	Kadoma	5,800	No
Recreational	Umfuli (Mfurudzi	Chegutu	12,700	No
Recreational	Lake Robertson (Manyame Lake)	Chegutu, Makonde and Harare	11,200	No
Recreational	Lake Cunningham	Insiza	4,172	No
Recreational	Chinhoyi Caves	Makonde	120	No
Recreational	Manjirenji	Zaka	3,400	No
Recreational	Bangala	Zaka and Masvingo	2,700	No
Recreational	Sebakwe	Kwekwe	2,600	No
Recreational	Robert McIlwaine (Chivero)	Harare	6,180	No
Recreational	Umzingwane	Umzingwane	1,233	No
Recreational	Kyle (Mutirikwi)	Masvingo	16,900	No
Recreational	Lake Matopos	Matobo	2,900	No
Total Area of Recreational Parks, Lakes and Dams			**357,161**	

Total Area National Parks (ha)	2,717,710
Total Area of Botanical Gardens and Botanical Reserves:	2,069
Total Area Sanctuaries	18,980
Total Area of Safari Areas:	1,891,900
Total Area of Recreational Parks, Lakes and Dams	357,161
Total Ha	**4,987,820**

2. Forestry Land

Land	Name	District	Area (ha)	Presence of lion
Forestry Areas	Fuller	Hwange	23,300	Yes
Forestry Areas	Panda Masuie	Hwange	33,500	Yes
Forestry Areas	Kazuma	Hwange	24,000	Yes
Forestry Areas	Mvutu	Hwange	2,100	No
Forestry Areas	Sikumi	Hwange	54,400	Yes
Forestry Areas	Gwayi	Lupane	144,265	Yes
Forestry Areas	Lake Alice	Lupane	39,000	No
Forestry Areas	Ngamo	Lupane	102,900	Yes

Land	Name	District	Area (ha)	Presence of lion
Forestry Areas	Chisengu	Lupane	4,006	No
Forestry Areas	Glencoe	Lupane	2,050	No
Forestry Areas	Lionhills	Lupane	2,747	No
Forestry Areas	Martin (i)		400	No
Forestry Areas	Martin (ii)		4,400	No
Forestry Areas	Mudima		6,355	No
Forestry Areas	Nyambewa		5,484	No
Forestry Areas	Tandai		5,450	No
Forestry Areas	Tarka		4,343	No
Forestry Areas	Gwampa	Nkayi	47,000	No
Forestry Areas	Chesa	Nkayi	14,250	No
Forestry Areas	Inseze	Nkayi	35,200	No
Forestry Areas	Inseze Extension	Nkayi	8,400	No
Forestry Areas	Umgusa	Nkayi	32,200	No
Forestry Areas	Umzibani	Nkayi	2,471	No
Forestry Areas	Kavira	Binga	28,200	Yes
Forestry Areas	Mzolo	Binga	67,200	No
Forestry Areas	Sijarira	Binga	25,600	Yes
Forestry Areas	Bembesi	Binga	55,100	No
Forestry Areas	Molo	Binga	2,900	No
Forestry Areas	Mtao	Chirumanzu	8,170	No
Forestry Areas	Chirindu	Chirumanzu	950	No
Forestry Areas	Gungunyana	Chirumanzu	1,650	No
Forestry Areas	Mafungabusi	Chirumanzu	82,100	No
Forestry Areas	Mudzongwe	Chirumanzu	1,420	No
Forestry Areas	Ungwe	Chirumanzu	567	No
Forestry Areas	Nyangu	Chirumanzu	16,600	No
Forestry Areas	York	Chirumanzu	1,455	No
Forestry Areas	Banti	Mutare	2,219	No
Forestry Areas	Stapleford	Mutare	24,600	No
Rhodes Estate	Erin	Nyanga	10,700	No
Rhodes Estate	Sauerdale North	Nyanga	214	No

Land	Name	District	Area (ha)	Presence of lion
Total Forest Areas (ha)			927,866	

3. CAMPFIRE Districts

District	Natural Region	Total Area (km^2)	Area of CF Wards (km^2)	Number of Wards	CF Wards	District Pop (persons)	Presence of lion
Beitbridge	5	12,935	4,595	21	6	80,946	Migratory
Binga	3,4&5	12,308	7,930	27	21	87,802	Migratory
Bubi	4	5,547	88	12	2	36,614	Migratory
Bulilimamangwe	4&5	12,574	1,530	33	10	156,641	Migratory
Chaminuka	2a,2b,3,4&5	2,752	380	26	2	94,047	No
Chimanimani	1,2a,3,4&5	3,419		28		110,836	No
Chipinge(Gazaland)	1,2a,3,4&5	5,223	408	33	2	336,893	Migratory
Chiredzi(Gaza Khomanani)	5	17,748	3,633	32	9	183,228	Yes
Chiweshe(Mazowe)	2a	4,482	375	29	5	198,319	No
Gokwe North	3,4&5	7,359	2,523	25	4	164,558	Migratory
Gokwe South	3&4	11,138	1,308	28	6	238,581	Migratory
Goromonzi	2a	2,504		26		147,126	No
Mbire (Guruve)	2a,3&4	7,810	4,215	28	14	135,637	Yes
Gwanda	4&5	10,792	2,283	23	6	112,984	No
Hurungwe	2a,3,4&5	19,895	2,793	40	9	246,902	Yes
Hwange	4&5	29,934	4,021	27	15	71,707	Yes
Hwedza	2b&3	998				69,981	No
Kusile(Lupane)	3&4	7,780	2,885	24	11	94,469	Migratory
Marondera	2a&2b	3,554		24		104,601	No
Matobo	4&5	7,278	1,233	26	4	89,281	No
Mudzi	4	4,222	1,009	18	2	109423	No
Mutoko	2b,3&4	4,052		29		122,941	No
Muzarabani	2a,3&4	4,322	2,540	17	9	69,851	Migratory
Mwenezi	4&5	12,933		31		101,354	Migratory
Nkayi	4	5,333	2,628	23	6	113,302	Migratory
Nyaminyami(Kariba)	4&5	6,327	3,532	16	11	27,717	Yes
Nyanga	1,2b,3&4	5,738	253	37	1	128,439	Migratory
Pfura(Mt. Darwin)	2a,2b,3&4	1,771				164,362	No
Rushinga	3&4	2,408		17		75,332	No
Tsholotsho	4	7,823	5,354	20	8	111,828	Yes
UMP Zvataida	2b,3&4	2,682	619	15	2	86,302	No
Umzingwane	4	1,074				62,954	No

District	Natural Region	Total Area (km^2)	Area of CF Wards (km^2)	Number of Wards	CF Wards	District Pop (persons)	Presence of lion
Zivagwe	4	2,363				65,752	No
TOTAL/AVERAGE		247,078	56,135	735	165	4,000,710	

4. Conservancies

	Name of Conservancy	District	Area (hectares)	Presence of lion
Conservancies	Malilangwe	Chiredzi	40,000	Yes
Conservancies	Save	Chiredzi	344,200	Yes
Conservancies	Chiredzi River	Chiredzi	28,500	No
Conservancies	Bubye Valley	Matabeland South	374,000	Yes
Conservancies	Bubiana	Matabeland South	130,000	No
Conservancies	Gwayi	Hwange	150,897	Migratory
Conservancies	Midlands Black Rhino	Midlands	85,000	No
Other	Matetsi Farms	Hwange	155,627	Migratory
Total Area of Conservancies			**1,308,224**	

12.2 ANNEX II: SUMMARY OF PRIMARY LEGISLATION AND REGULATIONS

12.2.1 The Policy for Wild Life of 1992

This policy provides for Government to maintain a protected area network known as the Parks and Wild Life Estate for the conservation of the nation's wild resources and biological diversity. According to the policy, government will use the Estate to promote a rurally based wild life industry and will harmonise the management of the Estate with the efforts of neighbouring communities that are developing wild life as a sustainable form of land use. The policy vests executive responsibility for the Parks and Wildlife Estate in the Department of National Parks and Wild Life Management (DNPWLM). It provides for the following categories of protected area: National Park; Safari Area; Sanctuary; Recreational Park, Botanic Reserve and Botanic Garden.

- The objectives of the Parks and Wild Life estate will be to:
- Preserve representative samples of Zimbabwe's aquatic and terrestrial flora and fauna and their physical environments;
- Protect areas of scenic beauty and special interest;
- Preserve rare, endangered and endemic species;
- Conserve water catchments;
- Provide opportunities for public education and the advancement of scientific knowledge;

and, without prejudice to any of the above:

- Encourage public use related to the enjoyment and appreciation of these areas; and
- Generate economic activity within the Estate and surrounding areas to enhance rural development.

The policy commits the DNPWLM to an adaptive management strategy in which research and monitoring are incorporated as integral components of management. It states that where sport

hunting is an objective in a protected area, quotas will be set to the maximum sustainable level at which trophy quality can be maintained and the hunting can be marketed. In terms of the policy the emphasis of tourism in parks should be low density and high quality tourism. An EIA must be carried out for major developments such as construction of roads, powerlines, buildings or dams.

With respect to Wildlife Conservation, the Policy states that the Government of Zimbabwe aims to encourage the conservation of wild animals and their habitats outside the Parks and Wild Life Estate recognising that this is only likely to be successful if wild life can be used profitably and the primary benefits accrue to people with wild life on their land. *"Recognising that much of Zimbabwe does not consist of good arable land, Government regards wild life management in all its diverse forms as a legitimate land use which may be the most appropriate or highest-valued form of development in many areas"*. The policy also states that Government will take the necessary legal and enforcement measures to prevent the illegal use of wildlife.

Addressing community rights to natural resources the Policy states that government intends to *"transform land use in remote communal areas through its Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), under which rural peoples have the authority to manage their wild life and other natural resources and benefit directly from so doing"*. Further government will *"ensure that wildlife is not undervalued to the people living with it by permitting them to use it sustainably for their own gain as they are able to do with other natural resources and agricultural products"*.

The policy states that the mechanism for communities to gain rights over wild life will be through the granting of Appropriate Authority to Rural District Councils (under the Parks and Wildlife Management Act of 1975). For this authority to be granted, the Minister will require:

1. An acceptable management plan from councils in which objectives for wild life are stated and preliminary intentions for achieving these objectives are outlined;
2. An acceptable institutional plan which outlines clearly the methods by which councils intend a) to involve wild life producer communities in district level management and b) to devolve the decision-taking process in local wild life management and the distribution of wild life benefits to producer communities;
3. The department to assist councils in managing their wild life and to coordinate the activities of NGOs who are assisting councils;
4. The approval by the department of all annual quotas of wild life killed or sold in communal lands during the interim period while councils develop their management capacity;
5. The presentation of annual reports from Councils to the Director and to their constituents detailing the year's performance in wild life management in their district.

The policy provides for the Minister to withdraw Appropriate Authority from a council not conforming to conditions and objectives under which it was granted.

12.2.2 Wildlife Based Land Reform Policy

In 2004 there was a move to revise the Policy for Wildlife to cater for the Land Reform programme. The revised policy, known as the Wildlife-Based Land Reform Policy, has not however been formally accepted by Government. Nonetheless, it is important to summarise what was envisioned at that time since this has influenced the way the management of wildlife outside of the Parks Estate has unfolded.

The vision of this reformed policy is to ensure profitable, equitable and sustainable use of wildlife resources, particularly in areas where agricultural potential is limited. It states that *"the policy has*

been developed in the context of Zimbabwe's Land Reform Programme and is underpinned by recognition that wildlife is a viable land-use option, that it can facilitate attainment of equity objectives and that it is feasible. This policy is complemented by existing natural resources legislation and the state protected area system."

The policy also states that the key issues that were taken into consideration were:

- The State will continue to make provision for wildlife management outside the protected area system, including setting aside certain core zones for wildlife production. Wildlife should be the only permitted primary land use option in these areas.
- Outside core zones, wildlife production, amongst other land use options, will be encouraged. The most profitable and ecologically sustainable land use option must be allowed to evolve in response to changing economic influences, notwithstanding the need to ensure food security in these areas.
- The scale of wildlife operations must be allowed to vary from intensive to extensive, depending on agro-ecological settings.
- All beneficiaries of wildlife operations, whether individually or jointly, must equitably share the costs of production.
- Wildlife management responsibility and authority must be devolved to the most appropriate level for efficient resource management and production incentives must be maximized for landholders.
- Security of tenure over resources is key to successful wildlife-based land reform. These core areas should be identified.

The aims of the Wildlife-Based Land Reform Policy are listed as:

1. To facilitate the indigenisation of the wildlife sector and to ensure more equitable access by most Zimbabweans to land and wildlife resources and to the business opportunities that stem from these resources.
2. To maintain a proportion of land outside state protected areas under wildlife production.
3. To enhance diversity of land uses through wildlife production.
4. To promote secure and equitable tenure.
5. To develop and implement appropriate institutional arrangements for wildlife-based land reform.

The policy recognized that wildlife production can be at different scales, which are dependent on several factors that include the type of wildlife, management regime and ecological conditions. Three categories are highlighted in the policy:

1. Intensive production systems with captive or semi-captive species such as crocodiles and ostriches (1 – 100 hectares).
2. Semi-intensive to semi-extensive production systems with free-ranging "plains game" populations (1,000 to 10,000 hectares).
3. Extensive production systems incorporating "big game" populations (over 10,000 hectares).

The Wildlife Based Land Reform Policy promotes two land redistribution models:

1. A state leasehold approach which is based on the reallocation of leasehold leases.
    a. This approach entails the acquisition of the entire land-holding with compensation for infrastructure, wildlife, etc.,

b. The land will be reallocated to lessees under terms and conditions that will ensure sustainable wildlife management, on-going investment and capacity-building in that area.

2. A corporate equity model that involves transfer of shares within a land-owning company.
    a. The transfer of shares will be in accordance with the Indigenisation goals and sound business principles;
    b. Proposals from stakeholders must outline realistic ways in which new entrants can increase their shareholdings well beyond an initial level, over a reasonable time scale.
    c. The proposals must make provision for immediate allocation of shareholdings to new participants.

The Policy document also acknowledges that the two approaches can be applied in combination and shall be considered on a case by case basis, and that the State may from time to time consider other approaches that meet the objectives of the Wildlife Based Land Reform Policy.

12.2.3 Parks and Wild Life Act Chapter 20:14 of 1996 as amended in 2001:

This is the pivotal Act with respect to wildlife management in Zimbabwe. The Act includes the following sections:

1. Parks and Wildlife Board
2. Parks and Wildlife Estate and Parks and Wildlife Land
3. National Parks
4. Botanical Reserves and Botanical Gardens
5. Sanctuaries
6. Safari Areas
7. Recreational Parks
8. Specially Protected Animals
9. Specially Protected Indigenous Plants
10. Indigenous plants
11. Hunting, removal, viewing and sale of animal products
12. Protection of animals and Indigenous plants on alienated land
13. Fish Conservation
14. Evidence, prevention and detection of offences and additional penalties and forfeitures
15. Inspectors, Officers, employees and advisory committees
16. General

The Act also defines the different types of land (Alienated land):

a. "Private Land" means land the ownership of which is vested in any person other than the President.
b. "State Land" means land vested in the President other than Communal Land or trust land vested in the President.
c. "Trust land" means any land, other than Communal land held in trust by the President or a statutory body or by a person, whether solely or jointly with others, by virtue of his being the holder of some office in a statutory body.

The Parks and Wildlife Act of 1975 (as amended) states that the purposes of National Parks are:

1. To preserve and protect the natural landscape and scenery.
2. To preserve and protect wild life and plants and the natural ecological stability of wild life and plant communities for the enjoyment, education and inspiration of the public.

Establishment of Protected Areas: The Act enables the President to declare National Parks on State land or Trust Land if the trustees give their consent (Section 22). The Act enables the Minister acting on the authorisation of the President to acquire land for the Parks and Wild Life Estate either compulsorily or by agreement in terms of the procedures contained in the Communal Land Act and the Land Acquisition Act. The Act gives the Minister the power to manage National Parks, control entry and authorise or restrict certain activities and carry out various conservation measures. The Act provides for the provision of facilities and services for tourists in National Parks or to lease out such facilities or services. The Act allows the Minister to issue a permit for hunting in National Parks.

The Act makes provision for the establishment of Botanical Reserves and Botanical Gardens (Section 26) on State Land or Trust Land for the preservation and protection of rare or endangered indigenous plants or representative plant communities for the enjoyment, education and benefit of the public.

A third category of protected area is a Sanctuary which may be established by the President on State Land or Trust Land (Section 31) to afford special protection to all animals or a particular species of animal in the sanctuary for the enjoyment and benefit of the public. The Minister may provide tourism facilities and services in a Sanctuary or lease facilities or services. The Minister may also issue permits for hunting or the removal of game from a sanctuary for certain purposes.

In terms of the Act the President may establish Safari Areas on State Land or Trust Land as part of the Parks and Wild Life Estate (Section 36) for the preservation and protection of the natural habitat and the wild life in these areas in order that facilities and opportunities may be afforded to the public for camping, hunting, fishing, photography, viewing of animals, bird watching and similar activities. The Minister may lease sites in safari areas for various purposes and may grant hunting or other rights. Hunting or removal of wildlife in a safari area may only take place with a permit.

The fifth category of protected area provided for by the Act is a Recreational Park (Section 41), which may be established by the President for the purpose of preserving and protecting the natural features for the enjoyment, benefit and recreation of the public. The Minister may designate areas within Recreational Parks which can be alienated or leased for the provision of tourism facilities and services.

Prospecting and mining are prohibited in National Parks, Botanical Reserves, Botanical Gardens, Sanctuaries or Recreational Parks without a permit issued by the Minister and with the consent of the Minister of Mines (Section 119). The Environmental Management Act of 2002 also makes provision for land to be acquired by the State for conservation purposes. According to Section 109 the President may acquire land or set land aside for the improvement or proper management of the environment. In the absence of an agreement with the land owner the President may acquire the land in accordance with the procedures under the Land Acquisition Act. The President may set aside any area of Communal Land for the conservation or improvement of natural resources or for the protection of irrigation works or sources of water supplies provided that no such area shall be set aside until the Minister responsible for the administration of the Communal Land Act is satisfied that suitable provision has been made elsewhere for the inhabitants who will be affected by the setting aside of the area (Section 110).

Specially Protected Animals and Plants: The Act makes provision for the Minister to declare certain animals as specially protected (Section 44). In terms of the Act, no-one may hunt, have in their possession, or sell a live specially protected animal or the meat or trophy from such an animal without a permit. The trophy of any specially protected animal must be surrendered to the state if not obtained by a permit. The Act specifies the purposes for which the Minister may issue a permit for use of

specially protected animals (Section 46), but provides the Minister with some flexibility as he/she may issue a permit for any purpose which in the opinion of the Minister is in the interests of the conservation of animals.

The Act also makes provision for the declaration of specially protected indigenous plants (Section 49). No person may pick a specially protected plant without a permit, although the owners or occupiers of land or a person acting under their authority may pick a specially protected plant for cultivation, forestry, building construction or the construction of roads and other infrastructure. No person may sell a specially protected plant without a permit unless the person is a recognised dealer in specially protected indigenous plants or a member of a recognised horticultural society and the purchase is from a member of the same or other recognised society. The Act specifies the purposes for which the Minister may issues permits for the picking or sale of specially protected indigenous plants. The Act also stipulates that no person may pick or sell indigenous plants without a permit (Section 55) provided that the appropriate authority for any land may pick or sell or authorise others to pick or sell indigenous plants (Section 56). If the Minister deems it necessary for the conservation of an indigenous plant, the Minister may prohibit the picking or selling of that plant (Section 57).

Hunting and removal of animals: The Act prohibits hunting, removal of an animal or any part of an animal or the sale of an animal without a permit unless by an appropriate authority for the land (Section 59), which is the owner of freehold land, a Rural District Council on communal land, the Forestry Commission on state forests and the DNPWLM on the parks and Wildlife Estate. The appropriate authority for the land may issue permits to others to use the wild life (except for specially protected species). If the Minister deems it necessary for the conservation of a animal, he/she may prohibit the hunting or removal of such animals in a specific area (Section 60) and may serve a notice to prohibit a specific person from hunting, conducting photographic tourism, or being in the possession of a weapon used for hunting save for self-defence. The Minister does not have to give reasons for such prohibitions. The Act enables the killing of an animal without a permit for self-defence (Section 61).

The Act prohibits anyone from conducting of hunting or photographic safaris within the parks and wild life estate or on forest land without holding a professional hunter's licence or a professional guide's licence (Section 65). No person may manufacture an article from a trophy, process a trophy or sell or otherwise dispose of a trophy or an article manufactured from a trophy from an animal that has been hunted in contravention of the Act (Section 73).

If the Minister believes it in the interests of conservation, he/she may declare any animal that is not a specially protected animal as a protected animal and any indigenous plant that is not a specially protected plant as a protected plant (Section 77) on alienated land within the area of an environment committee established in terms of the Environmental Management Act of 2002 and the Rural District Councils Act of 1988. No person may, without a permit, hunt an animal or pick an indigenous plant that has been declared protected. The Minister may also restrict the extent of hunting animals or picking of indigenous plants on alienated (private freehold) land in the area of an environment committee if the Minister believes that the hunting of animals or picking of plants is unsustainable. The Minister may authorise an environment committee to reduce the numbers of problems animals on any alienated land within its area if the number of such animals is sufficient to cause excessive damage or nuisance. Section 79 gives environment committees the power to restrict hunting on alienated land if it believes that hunting is unsustainable.

The Minister may declare any person to be the appropriate authority for any waters (Section 83) and may declare controlled fishing waters (Section 84) for which the Minister may make regulations for

the control, regulation, restriction of prohibition of fishing. Unless the Minister designates areas of water where a permit is not required, no-one except the appropriate authority for that water may fish in any water without a permit. Section 87 regulates the means of fishing by prohibiting the use of explosives, firearms and poisons. Section 88 controls the introduction into any water of fish and plants that are not native to that water. No-one except the appropriate authority for a water may fish commercially and sell the fish without a permit (Section 90). The minister may ban fishing by specific persons in any area in the interests of conservation (Section 96).

Enforcement: The Act provides for the powers of conservation officials, and police officers in relation to enforcing the Act. It provides for penalties for various offences and for the Minister to make regulations on a wide range of issues and activities. The Act provides for the highest penalties to be awarded for the unlawful killing of a rhinoceros or other specially protected game specified by the Minister in an
official notice and for the unlawful possession or trade in rhino horn, ivory or the trophy of any other specially protected animal specified by the Minister in an official notice (Section 128).

The Environmental Management Act of 2002 provides the Minister responsible for the Environment to regulate the use of wetlands. In terms of Section 113 of the Act the Minister may declare any wetland to be an ecologically sensitive area and may impose limitations on development in or around such area. Further, no person may without authorisation in terms of the Act:

a. reclaim or drain any wetland;
b. disturb any wetland by drilling or tunnelling in a manner that has or is likely to have an adverse impact on any wetland or adversely affect any animal or plant life therein;
c. introduce any exotic animal or plant species into the wetland. Section 114 enables the Minister to serve an order on the owner, occupier or user of land under which they must take measures, construct such works or refrain from specific activities in order to protect the environment.

Biological Diversity: Further the Act enables the Minister to take such measures as may be necessary for the conservation of biological diversity and the implementation of Zimbabwe's obligations under the United Nations Convention on Biological Diversity adopted in 1992 and may, in so doing (Section 116):

a. identify the components of the biological diversity of Zimbabwe;
b. determine the components of biological diversity which are threatened with extinction;
c. prepare and maintain an inventory of the biological diversity of Zimbabwe;
d. determine actual and potential threats to the biological diversity and devise such measures as are necessary for preventing, removing or mitigating the effect of those threats;
e. devise measures for better protection and conservation of rare and endemic species of wild fauna and flora;
f. develop national strategies, plans and programmes for the conservation of the biological diversity of Zimbabwe;
g. promote the integration of conservation and sustainable use of biological diversity into relevant sectoral policies, plans and programmes;
h. require in writing any developer, including the government, to integrate the conservation and sustainable utilisation of the biological diversity in any project the implementation of which has or is likely to have detrimental effects to the biological diversity of Zimbabwe;
i. protect indigenous property rights of local communities in respect of biological diversity with scientific knowledge;

j. support the integration of traditional knowledge on conservation of biological diversity with scientific knowledge;
k. prohibit or restrict access by any person to or the exportation of any component of the biological diversity of Zimbabwe.

The Minister may also take such action or measures as may be necessary for the conservation of the biological diversity of a specific locality and may:

a. promote such land use methods as are compatible with the conservation of the biological diversity of that locality;
b. select and manage environmental protection areas for the conservation of the various terrestrial and aquatic ecological systems;
c. establish and manage buffer zones near environmental protection areas;
d. prohibit or control the importation of and introduction into the wild of exotic animal and plant species;
e. identify, promote and integrate traditional knowledge into the conservation and sustainable utilisation of the biological diversity of that locality; and
f. determine special measures for the protection of species, ecosystems and habitats faced with extinction.

Community rights to natural resources: The Act provides for land holders to acquire rights over wildlife through the granting of "appropriate authority" status. Thus, the owners of private freehold land are deemed to be the appropriate authority over wildlife on their land (Section 2). Communities acquire rights over wildlife through Rural District Councils (RDCs). A 1982 amendment to the Act provides for the Minister to appoint an RDC as the appropriate authority for wild life on the communal land within the jurisdiction of the RDC (Section 108). The Act states that no person may hunt any animal on any land or remove any animal or part of an animal except in term of a permit issued by the appropriate authority for that land [Section 59(2)]. The appropriate authority may hunt any animal on the land, remove any animal or part of an animal from the land and may issue permits to others to hunt or remove animals from the land. RDCs are then expected to apply the guidelines contained in the 1992 Wildlife Policy to devolve the decision-taking process in local wild life management and the distribution of wild life benefits to producer communities (i.e. smaller and more localised groups of people with wildlife on their land). Further policy guidelines state that RDCs
are expected to distribute a percentage of income derived from wildlife use to producer communities and to allow these communities to be responsible for several wildlife management activities. Because of the existing administrative system of local government, producer communities had to be represented by Ward Development Committees (WADCOs) and Village Development Committees (VIDCOs) which are advisory bodies to Councils.

In this way, various legal entities are granted authority over wildlife outside the Parks Estate. These authorities include private land-owners (where the land is held under an agreement of purchase or lease), forest land (such as Forestry Commission estates). For Communal Land, the Rural District Councils (RDC) may be appointed the Appropriate Authority. The Minister of Environment grants this authority, with input from the Zimbabwe Parks and Wildlife Management Authority. If appropriate authority is not granted, the authority remains vested in Central Government. This Appropriate Authority clause in the Act, paved the way for the implementation of the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE)[3].

Statutory Instruments: There are several statutory instruments (SI) that regulate the wildlife sector:

[3] Note that the CAMPFIRE programme is about to undergo a comprehensive review that will impact on future policies.

- SI 362 of 1990: This legislation provides in sections 66-75 for the Regulation of Manufacture, Processing and Dealing in trophies.
- SI 76 of 1998: Parks and Wild Life (Import and Export) (Wild Life) Regulations specifically deals with Import and Export of wildlife products. This legislation was enacted to ensure compliance with CITES requirements for export and import of wild flora and fauna. These provide for the following:
    - Section 3 deals with the Control of Import and Export of wild life and trophies and lays down a general prohibition on the import into or export from Zimbabwe of any "wild life" or trophy of "wild life" except in accordance with either a certificate issued in terms of section 5 by the Director or Director of Customs, or an open general permit:
    - Section 5 deals with Permits and Certificates and is consistent with CITES legislation.
    - Section 15 deals with Offences and Penalties. Any person who contravenes any of the provisions of subsection 1 shall be guilty of an offence, and liable to a fine or imprisonment. To effectively ensure compliance, the Zimbabwe Parks and Wildlife Management Authority deployed a permanent team of officers based at all ports of exit and entry to assist border control officials in monitoring and inspection of all wildlife exports.
- SI 26 of 1998: The regulation provides for the monitoring of all hunting activities in the country to ensure compliance by all Safari Operators and international clients and to ensure that the TR2 Form. (Tourism Hunting Return Form) is duly completed.
- Trapping of Animals (Control) Act Chapter 20:21: The Act provides for the control, restriction and regulation of the construction, possession and use of certain traps for the purpose of trapping animals; to control the sale and disposal of certain animals, to include lions and to provide for matters incidental to or connected with the foregoing.
- SI 92 of 1992: Parks and Wild Life (Payment for Hunting of Animals and Fish) Notice, 2009: This instrument provides for compensation values of various wildlife forms to include animals and fish. It acts as an additional deterrent measure in matters where poaching cases are being dealt with in accordance with the law. The compensation value for illegal hunting of lion is USD 5 000, 00.
- SI 93 of 2009: Parks and Wild Life (Payment for Trapping of Wild Animals) Notice, 2009. This instrument provides for the payment of compensation to the state or game owners in the event that one is convicted for illegally trapping wild animals on various land categories. The compensation value for illegal hunting of lion is USD 5 000, 00.
- SI 40 Of 1994: Parks and Wildlife (Appropriate Authorities for Communal Land) Notice, 1994. This SI facilitates the granting of Appropriate Authority status to various Rural District Councils. This legislation devolved authority to Rural District Councils and gave rights to local communities to sustainable utilize wildlife and other natural resources in their areas of jurisdiction.

12.2.4 The Rural District Councils Act Chapter [29:13] 2002

The Rural District Councils Act is important in the wildlife sector as it provides for a legal entity (in Communal Lands) responsible for wildlife resources. Since the land in Communal areas is not privately owned by the communities and given that most of the communities do not constitute a legal entity, the Appropriate Authority status is conferred to the Rural District Councils (RDCs). Thus the RDCs act as custodians of the wildlife resources on behalf of the communities.

Efforts are now underway in some areas to form Community Development Trusts. There is scope for these Community Development Trusts to be used as vehicles to further devolve authority from the District level to the sub-district level, which will provide more income at a community level and therefore increase conservation support from the community as they will have a true vested interest.

The feasibility of granting Appropriate Authority to these Trusts in Zimbabwe needs to be assessed and piloted. The major challenge with these Trusts is that of financial sustainability as they do not have adequate funds to cater for their activities. Capacity-building of all Trust members is also a key requirement to ensure institutional sustainability.

In the Rural District Councils Act, there are three key terms that will be described further: Ward, Ward Development Committee and Communal Land. According to the Act, a "Ward" (an administrative unit) means a ward into which a council area is divided or re-divided. Several villages make up a ward. In the Act, a "Ward Development Committee" means a village development committee established in terms of Section 58 of the Act. A Ward Committee is made up of members who are elected from the community to represent the community in discussions/meetings with the Rural District Council. The Act further defines three different types of Wards. These are, Commercial Ward, Communal Ward and Resettlement Ward. The Commercial Ward is a large-scale commercial ward or a small-scale commercial ward. A Communal Ward is a ward consisting wholly or mainly of Communal Land. A Resettlement Ward is a ward consisting wholly or mainly of Communal Land (as in the case of the Communal Ward). It is important to establish whether in practice, the RDCs make this distinction of the wards or whether they are all considered simply just as wards.

The "Communal Land" is defined as any land that is Communal Land in terms of the Communal Land Act [Chapter 20:04]; and any other land that was within the area of a district council on the 19th August 1988.

12.2.5 The Forest Act of 1948

This Act establishes the Forestry Commission and places demarcated forests under its control. The commission is responsible for the control, management and exploitation of state forests including the leasing of timber harvesting rights. The Act also gives the Minister the power to regulate the commercial use of timber from indigenous trees on other land.

As the appropriate authority for the Forest Areas, the Commission is also responsible for the management and conservation

12.3 Annex III: Analysis of Total Revenue by Country of Destination

Destination	2014	2015	Total
United States	$14,485,835	$11,942,785	$26,428,620
Russian Federation	$1,444,729	$861,925	$2,306,654
China	$1,416,196	$441,759	$1,857,955
Germany	$1,100,534	$698,450	$1,798,984
Canada	$620,852	$474,935	$1,095,787
South Africa	$513,070	$576,035	$1,089,105
France	$825,975	$158,291	$984,266
Australia	$671,527	$259,136	$930,663
Spain	$488,616	$321,064	$809,680
Austria	$519,322	$201,073	$720,395
India	$302,653	$241,741	$544,394
United Kingdom	$357,317	$183,888	$541,205
Italy	$181,956	$343,197	$525,153
Hungary	$418,824	$104,262	$523,086
Mexico	$252,263	$266,543	$518,806

Destination	2014	2015	Total
Norway	$300,645	$119,831	$420,476
Denmark	$132,690	$194,435	$327,125
Switzerland	$171,991	$123,828	$295,819
Sweden	$196,575	$80,014	$276,589
Ukraine	$80,432	$163,604	$244,036
Czech Republic	$104,450	$137,456	$241,906
Neatherlands	$89,042	$105,227	$194,269
Nigeria	$171,830	$0	$171,830
Bulgaria	$21,865	$123,469	$145,334
Argentina	$106,529	$24,888	$131,417
Finland	$65,768	$63,223	$128,991
Brazil	$56,785	$59,886	$116,671
Honduras	$104,683	$0	$104,683
Poland	$38,911	$62,015	$100,926
New Zealand	$17,880	$81,127	$99,007
Mauritius	$56,225	$36,945	$93,170
Chile	$91,374	$0	$91,374
Belgium	$9,340	$80,355	$89,695
Portugal	$78,470	$0	$78,470
Columbia	$77,944	$0	$77,944
Slovakia	$69,420	$0	$69,420
Botswana	$59,401	$0	$59,401
Pakistan	$54,208	$0	$54,208
Namibia	$20,298	$18,862	$39,160
Latvia	$37,611	$0	$37,611
Estonia	$12,078	$23,586	$35,664
Slovenia	$20,620	$11,200	$31,820
Kenya	$14,302	$16,957	$31,259
Dominican Republic	$30,463	$0	$30,463
Belarus	$0	$29,430	$29,430
Kazakhstan	$0	$28,460	$28,460
Romania	$0	$20,112	$20,112
United Arab Emirates	$19,629	$0	$19,629
Lao Peoples Democratic Republic	$15,000	$0	$15,000
Bolivia	$0	$11,553	$11,553
Lithuania	$9,164	$0	$9,164
Costa Rica	$5,900	$0	$5,900
Qatar	$4,896	$0	$4,896
Grand Total	**$25,946,088**	**$18,691,547**	**$44,637,635**

12.4 Annex IV: Analysis of Total Revenue by Species

Species	$2,014	$2,015	Total	2015 Quota	Utilised	% Utilised
Buffalo	$2,528,559	$1,962,570	$4,491,129	1,635	482	29%
Elephant (Tusks)	$2,042,610	$1,447,090	$3,489,700	246	64	26%
Elephant (Tuskless)	$1,444,040	$229,860	$1,673,900	462	113	24%
Lion	$630,950	$753,000	$1,383,950	82	49	59%
Leopard	$714,100	$668,490	$1,382,590	530	151	28%
Zebra	$594,239	$555,744	$1,149,983	2,480	600	24%
Sable	$456,615	$309,260	$765,875	718	78	11%
Kudu	$341,092	$357,963	$699,055	2,503	289	12%
Waterbuck	$293,903	$256,133	$550,036	988	156	16%
Hippo	$310,321	$217,470	$527,791	303	83	27%
Impala	$277,198	$242,624	$519,822	8,594	1,261	15%
Crocodile	$284,650	$202,705	$487,355	211	70	33%
Eland	$179,470	$187,990	$367,460	1,659	132	8%
Wildebeest	$180,665	$170,350	$351,015	2,189	220	10%
Giraffe	$158,385	$157,410	$315,795	880	135	15%
Nyala	$130,840	$117,175	$248,015	174	38	22%
Bushbuck	$116,011	$94,936	$210,947	1,082	125	12%
Warthog	$98,975	$89,820	$188,795	3,060	208	7%
Hyeana	$75,648	$54,503	$130,151	1,702	118	7%
Klipspringer	$44,130	$40,441	$84,571	823	59	7%
Bush Pig	$18,226	$30,370	$48,596	1,972	69	3%
Tsessebe	$19,800	$19,500	$39,300	186	15	8%
Baboon	$24,909	$13,664	$38,573	8,017	264	3%
Reedbuck	$23,265	$12,731	$35,996	371	20	5%
Steenbok	$13,790	$15,070	$28,860	927	31	3%
Jackal	$9,656	$15,889	$25,545	2,179	105	5%
Civet	$8,850	$11,368	$20,218	1,034	29	3%
Grysbok	$9,435	$8,585	$18,020	632	31	5%
Eland	$16,750	$0	$16,750	1,659	132	8%
Genet	$6,020	$14,183	$20,203	1,136	38	3%
Duiker, Grey	$2,774	$12,523	$15,297	2,005	53	3%
Duiker, Blue	$7,991	$0	$7,991	-	-	-
Honey Badger	$3,681	$3,625	$7,306	622	15	2%
Wild Cat	$3,160	$4,180	$7,340	812	19	2%
Guinea Fowl	$5,496	$968	$6,464	29,174	121	0%
Porcupine	$4,123	$1,473	$5,596	857	9	1%
Serval	$2,670	$2,410	$5,080	536	6	1%
Egyptian Goose	$3,025	$60	$3,085	4	-	0%
Cheetah	$2,560	$0	$2,560	42	-	0%
Ant Bear	$900	$1,651	$2,551	39	6	15%
Francolin	$1,166	$609	$1,775	22,449	109	0.5%

Species	$2,014	$2,015	Total	2015 Quota	Utilised	% Utilised
Dove	$1,321	$418	$1,739	34,485	63	0.2%
Monkey, Vervet	$885	$800	$1,685	3,677	15	0.4%
Ostrich	$1,200	$0	$1,200	14	-	0%
Mongoose	$508	$690	$1,198	279	3	1%
Sandgrouse	$456	$688	$1,144	8,088	78	1%
Oribi	$500	$500	$1,000	82	2	2%
Duiker, Red	$950	$0	$950	-	-	-
Caracal	$900	$0	$900	351	-	0%
Bushbaby	$850	$0	$850	-	-	-
Bontebok	$700	$0	$700	-	-	-
Waterfowl	$0	$400	$400	40	2	5%
Springhare	$60	$120	$180	-	-	-
Gemsbok	$105	$0	$105	6	-	0%
Hyrax	$75	$20	$95	371	1	0.3%
Duck	$29	$20	$49	10,779	13	0.1%
Aardwolf	$0	$0	$0	-	-	-
Blesbok	$0	$0	$0	40		0%
Rabbit	$0	$0	$0	252	-	0%
Hare	$0	$0	$0	138	3	2%
Lichtenstein's Hartebeest	$0	$0	$0	5	-	0%
Red Hartebeest	$0	$0	$0	7	-	0%
Grand Total	**$11,099,187**	**$8,288,049**	**$19,387,236**			

(b) (6)

[redacted]

RCVD MAR 5 2019

TRANSMITTAL

To:	U.S. Fish & Wildlife Service
	Division of Management Authority
	Branch of Permits, MS: IA
	5275 Leesburg Pike
	Falls church, VA 22041-3803

Date:	2-27-19
Project No.:	
Project Name:	
Location:	
DEI Job No.	

We are sending you the following:

Copies	Date	Description
1		Completed Application for 1 Lion for Chris Peyerk with Check # 21266
1		Completed Application for 2 Leopards for Chris Peyerk with C21265heck #
1		Return UPS Envelope for Chris Peyerk
1		Completed Application for 1 Leopard for Irvin Rupersburg with Check # 21269
1		Completed Application for 1 Elephant for Irvin Rupersburg with Check # 21270
1		Return UPS Envelope for Irvin Rupersburg
1		Completed Application for 1 Lion for Chris Shea with Check # 21268
1		Completed Application for 2 Leopards for Chris Shea with Check # 21267
1		Return UPS Envelope for Chris Shea

Transmitted for your action:

Comments

Distribution: File

By: Linda Jurda-Wensink

An Equal Opportunity Employer

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No 1018-0093
Expires 05/31/2017

RCVD MAR 5 2019

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Rupersburg	Irvin	Stephen	Jr

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Shelby Township	MI	48315	Macomb	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of m[illegible] that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature[illegible]ponsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 2-22-19

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Chewore Safari Area - North Mashonaland West

   b. Date wildlife was hunted:

   October 14, 2018

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Dee Gilmour
Business Name:	Trophy Consultants International (T.C.I.)
Address:	4 Josiah Chinamano Road
Address:	Belmont
City:	Bulawayo
State/Province:	Zimbabwe
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, ca

(b) (6)

Applicant's signature: _____ Date: 2-22-19

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ZW 091/500
/2018-LOX
ZW 091/500
/2018-LOX
ELEPHANT
TROPHY EXPORT TAG
ZW 091/500/2018-LOX

ZW 20182201

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

little

Specified officer's signature and date-stamp

Cert. № 127101

Name IRVIN STEPHEN

RUPERSBURG. JNR

Address (b) (6)

46027 UNITED STATES

Tusk serial number	ZW 20182201
Tusk mass (kg)	11 kg
Tusk length (metric)	138cm
Sex	M

Authority TR2 81218

Signature of holder .....

Notes

1. This certificate must be returned to the *Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway*, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

ZW 20182202

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HO

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

little

Specified officer's signature and date-stamp

Cert. № 127102

Name IRVIN STEPHEN

RUPERSBURG. JNR 2

Address (b) (6)

46027 UNITED S

Tusk serial number	ZW 20182202
Tusk mass (kg)	11 kg
Tusk length (metric)	138cm
Sex	M

Authority TR2 81218

Signature of holder .....

Notes

1. This certificate must be returned to the *Director, Department of National* *and Wildlife Management, P.O. Box CY 140, Causeway*, in the event tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

FEB 0 4 2019 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HENDERSON	DONALD	E.	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, or P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MARCO ISLAND	FLORIDA	34145	COLLIER	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b)(6) [redacted] 2/1/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

DAN HENDERSON

(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTERO LEO (LION)

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   NAMWALA GAME MANAGEMENT AREA
   NAMWALA, ZAMBIA
   (NEAREST VILLAGE IS ITEZHI TEZHI)

   b. Date wildlife is to be hunted:
   1 AUGUST 2019 THROUGH 21 AUGUST 2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   GM ZAMBIA SAFARIS
   GREG MICHELSON PROFESSIONAL HUNTER

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:
   N/A

   b. Date wildlife was hunted:
   N/A

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NOT HUNTED YET DO NOT CURRENTLY HOLD ANY SUCH PERMITS

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: BANGWEULU TAXIDERMY
Address: 4142 IK CHIFWEMA ROAD, NEW KASAMA
City: LUSAKA
State/Province: LUSAKA
Country, Postal Code: ZAMBIA 10101

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
THE 3 YEAR TREND FOR LION IS UP BASED ON MONTHLY OBSERVATIONS AND TRAIL CAMERA SURVEYS.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
$ 15000 USED FOR 10 ANTI POACHING RANGERS, 21 COMMUNITY SCOUTS, COMMUNITY RESOURCE BOARD AND ZAMBIA GOVERNMENT FEES.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
BUILT 3 SCHOOLS FOR 270 CHILDREN
GAME MEAT FOR NEARBY COMMUNITIES
CONTRIBUTE FUEL AND RATIONS FOR DEPARTMENT OF NATIONAL PARKS AND WILDLIFE.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b)(6) [redacted] Date: 2/1/2019

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Vargas, Darcy <darcy_vargas@fws.gov>

MA25685D-0 - Arican lion

Barry, Anna <anna_barry@fws.gov> Sat, May 18, 2019 at 5:36 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

FYI

---------- Forwarded message ---------
From: **Management Authority, FWHQ** <managementauthority@fws.gov>
Date: Tue, May 7, 2019 at 7:27 AM
Subject: Re: [EXTERNAL] PRT number MA25685D-0
To: DON HENDERSON (b)(6)

Good morning Donald,

Thank you for your inquiry. Your application, #25685D that was received on February 4, 2019, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Thank you,
U.S. Management Authority, Branch of Permits.

****

Please review the U.S. Fish and Wildlife Service's Office of Law Enforcement's webpage on importing and exporting commercial wildlife shipments. Contact the Office of Law Enforcement to see if your situation applies.

Wildlife (including parts and products) imported or exported from the U.S. must be declared to the U.S. Fish and Wildlife Service. Please contact the Wildlife Inspector at the appropriate designated port to learn the requirements for your shipment.

Contact USDA-APHIS to determine their quarantine and health certificate requirements for import and export. Visit their website or call the National Import Export Services (NIES) Call Center: 301-851-3300.

Please check with the CDC for their requirements.

Contact the State and foreign country to check on their requirements.

We encourage permit applicants to review our tips and reminders for completing applications.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Mon, May 6, 2019 at 11:08 AM DON HENDERSON <don.henderson1@comcast.net> wrote:

> On February 7 FWS acknowledged receipt of my application. I am departing on this hunt in 83 days. Please bring me up to date on the status of my application. Donald E Henderson,
> (b)(6)

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 25685D / Lion Trophy Import

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 3:23 PM
To: (b)(6) [redacted]

Dear Mr. Henderson,

Ref: 25685D; Import of a lion trophy, from Mwanya GMA, Lusaka Zambia, to be taken between August 1-21, 2019.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please respond to question 7 of the application and provide a copy of the Zambia licenses/permits authorizing your lion hunt. Also, please be aware that your application will not be considered complete without this required information.

2. If available, please provide documentation to support your answers to application questions 9.a. through 9.c.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Application no. 25685D (specific date of hunt?)

Brisendine, Amy <amy_brisendine@fws.gov>

Tue 4/7/2020 1:15 PM

To: don.henderson1@comcast.net (b)(6)
Cc: Brisendine, Amy <amy_brisendi

Dear Mr. Henderson,

I apologize for the delay in processing your application to import a trophy of a lion that was hunted in Zambia (application no. 25685D, received in our office on 2/4/2019. Can you please provide me with the specific date the lion was hunted/taken?

Thank you and please contact me if have any questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

[EXTERNAL] Re: Application no. 25685D

DON HENDERSON (b)(6)
Fri 4/10/2020 4:20 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>

yes

> On April 10, 2020 at 2:18 PM "Brisendine, Amy" <amy_brisendine@fws.gov> wrote:
>
> Hi Mr. Henderson,
>
> Can I confirm that you are withdrawing your applicaon?
>
> Thank you again and best regards,
>
> Amy Brisendine
> U.S. Fish and Wildlife Service
> International Affairs, Division of Management Authority
> Branch of Permits
> 5275 Leesburg Pike, MS: IA; 2W059D
> Falls Church, Virginia 22041
> https://www.fws.gov/international/permits/
> https://www.cites.org
>
> Please see our application forms that are available for on-line submission here:
> https://www.fws.gov/international/permits/how-to-apply.html

---

From: DON HENDERSON (b)(6)
Sent: Friday, April 10, 2020 9:50 AM
To: Brisendine, Amy <amy_brisendine@fws.gov>
Subject: [EXTERNAL] Re: Applicaon no. 25685D (specific da te of hunt?)

Since I had no guarantee of being able to bring a lion into the country, I was forced to cancel the hunt.

> On April 7, 2020 at 1:15 PM "Brisendine, Amy" <amy_brisendine@fws.gov> wrote:
>
> Dear Mr. Henderson,
>
> I apologize for the delay in processing your application to import a trophy of a lion that was hunted in Zambia (application no. 25685D, received in our office on 2/4/2019. Can you please provide me with the specific date the lion was hunted/taken?

Thank you and please contact me if have any questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.or g

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

RCVD JUN 28 201

June 20, 2016

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: DONALD M. HUBER
(b) (6) [redacted]
LION PERMIT

To Whom it May Concern:

I purchased a $60,000 Lion Hunt for Zambia in February of 2015 for a September 2016 hunt.

I understand U.S. Fish and Wildlife now requires a Cities Permit for Lions. Enclosed is a completed Cities Permit Application and my check in the amount of $100. Please let me know if there is anything further I need to do as I am scheduled to fly out September 10, 2016 for my hunt September 12, 2016.

Thank you,

Don Huber

Don Huber
(b) (6) [redacted]
White Sulphur Springs, WV 24986
(b) (6) [redacted]

enclosures

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No 1018-0093
Expires 05/31/2017

RCVD JUN 28 2016

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Huber	Donald	M	

(b) (6) [redacted]

5. Affiliation/ Doing business as (see instructions): NA

(b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. *Name of business, agency, Tribe, or institution*	1.b. *Doing business as (dba)*		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

(b) (6) [redacted] ite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
White Sulphur Springs	WV	24986	Greenbrier	USA

(b) (6) [redacted] ifferent than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
White Sulphur Springs	WV	24986	Greenbrier	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 43490B No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other [redacted], and I certify that the information submitted in this application for a permit is complete and accurate to the [redacted]lse statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) [redacted]

[redacted]r permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 6/20/16

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   LION

   b. Sex (if known).
   MALE

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Lower Lupande hunting Block, in The Luanga Valley Eastern Zambia. GPS-S13.14775 E031 38 880
   Nearest City Chipata Area-MFuwe
   b. Date wildlife is to be hunted: September-12,30 2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks). Skull, Life Size mount

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Mary-Anne Fernandes
Business Name: Highveld Taxidermists
Address: P.O. Box 34242
Address: Farm 354, Vlakplatts, Hennopsriver 0023, South AFRICA
City: Erasmia
State/Province:
Country, Postal Code: South AFRICA 0023

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b)(6) Date: 6/20/16

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

DONALD M. HUBER (b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

LION ZAMBIA ESA TROPHY

Permit Number: MA00478C-0
Effective: 10/20/2017 Expires: 10/19/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

DONALD M. HUBER
(b) (6) [redacted]
WHITE SULPHUR SPRINGS, WV 24986
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

US Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
Attn: Caroline Harlow
5275 Leesburg Pike
Falls Church, VA 22051-3803
703-358-2104

FEB 0 6 2019

RE: Permit MA00478C-0 Renewal

Ms. Harlow,

Please find enclosed Form 3-200-52 for rewnewal of CITES Permit MA00478C-0, as well as a check for the $100 processing fee. I have also enclosed copies of the original permit (the original permit itself has gone missing in 18 months since issuance due to moving homes), as well as a copy of the CITES Export Permit from South Africa.

Please contact my son, Allan Bradley, at (b) (6) if you have any concerns as he is assisting us in this process.

Thanks,

Don Huber

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

FEB [illegible] 2019

FEB 0 6 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HUBER	DONALD	M	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
White Sulphur Springs	WV	24986	Greenbrier	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
Windermere	FL	34786	Orange	USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the [illegible]rtify that the information submitted in this application for a permit is complete and [illegible]e statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

2/4/19

[illegible]ed signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Allan Bradley, (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA00478C-0

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signatu[redacted] Date: 2/4/19

   X b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I he[redacted]f this permit with the indicated changes.

   Permittee's signat[redacted] Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

LION ZAMBIA ESA TROPHY

Permit Number: MA00478C-0
Effective: 10/20/2017 Expires: 10/19/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

DONALD M. HUBER
(b) (6) [redacted]

WHITE SULPHUR SPRINGS, WV 24986
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

PERMIT / CERTIFICATE № 213241

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

[ ] EXPORT
[X] RE-EXPORT
[ ] IMPORT
[ ] OTHER

ORIGINAL

2. Valid until 10/06/2019

3. Importer (name and address) Donald M. Huber
(b) (6)
White Sulphur Springs
WV 24986, U.S.A.

3a. Country of import U.S.A.

4. Exporter / Re-exporter (name, address and country)
Highveld Taxidermists
354 Vlakplaats
Hennopsriver
Erasmia, 0023

5. Special conditions Invalid without attached Permit Conditions (pag 2 of 2) Integrated document attached A-B ZA 202873 dd 29/06/2017 C-ZA 202914 dd 20/07/2017 replaces 206527 dd 22/08/2018

For live animals, this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations. Permit / certificate valid for one consignment only.

6. Name, address, national seal / stamp and country of Management Authority

Department of Environmental Affairs
Private Bag X447
PRETORIA
0001
SOUTH AFRICA

5a. Purpose of the transaction (see reverse) H

5b. Security stamp No. 1665480

	7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age/sex) if live	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported / quota
A	7.8 Lion (Panthera leo)	9. Full mount	10. II W	11. 1 (one)	11a.
	12. Country of origin* ZM	Permit No. 39354	Date 18/05/17	12a. Country of last re-export / Certificate No.	Date
					12b. No. of the operation ** or date of acquisition ***
B	7.8 Lion (Panthera leo)	9. Skull bleached	10. II W	11. 1 (one)	11a.
	12. Country of origin* ZM	Permit No. 39354	Date 18/05/17	12a. Country of last re-export / Certificate No.	Date
					12b. No. of the operation ** or date of acquisition ***
C	7.8 Hippo (Hippopotamus amphibius)	9. Tusks on Shield	10. II W	11. 12 (twelve)	11a.
	12. Country of origin* ZM	Permit No. 39354	Date 18/05/17	12a. Country of last re-export / Certificate No.	Date
					12b. No. of the operation ** or date of acquisition ***
D	7.8	9.	10.	11.	11a.
	12. Country of origin*	Permit No.	Date	12a. Country of last re-export / Certificate No	Date
					12b. No. of the operation ** or date of acquisition ***

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes
*** For Pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY:

LA Cotter

Pretoria
Place

11/12/2018
Date

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
11 DEC 2018
DIRECTORATE OF CONSERVATION PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

1665480

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	

15. Bill of Lading/Air Waybill Number:

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30):***
   Office: +27 (11) 390-3687/ 2311
   Fax: +27 (11) 390-1720

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of Importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement,*** for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.

12. Permit holders or their delegated agents must inform the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
11 DEC 2018
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

Signature of Issuing Officer	Date	Signature of Recipient	Date
LA Lötter		Lisa Ferreira	2019-01-05
Full Name		Full Name	

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade In Endangered Species Regulations, 2010.

INTEGRATED PERMIT No.: 213241

This is an integrated permit for species listed in the CITES- and Threatened or Protected Species Regulations under the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

Signature

Date:

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
11 DEC 2018
DIRECTORATE OF CONSERVATION PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

LION ZAMBIA ESA TROPHY

Permit Number: MA00478C-1
Effective: 04/17/2019 Expires: 04/16/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

for Gina Barry
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
DONALD M. HUBER
(b)(6) [redacted]
WHITE SULPHUR SPRINGS, WV 24986
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
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February 6, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD FEB 8 2019

RE: Import Application of Mozambique Lion Trophy for Ryan Herring

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Mozambique for Ryan Herring. Also attached to the permit application is the 2018 Operator Enhancement repot from Safrique - Mozambique Hunting Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Mozambique authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Ryan Herring's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: Ryan Herring

Date: 1/21/19

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD FEB 8 2019

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Lion - Mozambique
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Herring	Ryan	Anthony	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Lawton	OK	73501	Comanche	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Lawton	OK	73502	Comanche	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) — 1/19/19

rmit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   Same as above: Ryan Herring, (b) (6) [redacted]

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Ryan Herring (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   (Panthera, P. Leo) African Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Block L1 Niassa Reserve, Niassa Province, Mozambique

   b. Date wildlife is to be hunted: October 2020

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Safrique, Lda and Professional Hunter is Paul Davies

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name:
Address: 53 Maple St Pomona, Kempton Park, 1619, South Africa
City:
State/Province:
Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted? See attached operator report.

   Please see the attached Operator Enhancement Report.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   Please see the attached Operator Enhancement Report.

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   Please see the attached Operator Enhancement Report.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand [redacted]d into the United States, cannot be re-exported.

    Applicant's signature: (b) (6) _____ Date: 1/21/19

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: _Block L1 Safrique_____

   a. Years in business: _11 years_____

   b. Name of company conducting hunt: __Safrique Safaris_____

   2. Name of concession: __Block L1___ Size in km^2: __4,000 _____

   a. Land tenure: __ Government lease X Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 15 years_____ Can it be renewed? X Yes __ No

   c. Length of renewal, if applicable: Further 15 years_

   d. Estimated total amount received in trophy fees last year, if applicable: $_____

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: _____All the above_____

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Mavago District, Lichinga City__

   g. If the concession borders a national park, please provide the park name: Niassa

   h. Description of general and distinctive habitat features and any water features: Miombo Woodland / Lussa_____

3. Are there any communities living in the concession? X Yes __ No

   a. If so, estimated number of people or villages in the concession? 18,000_____

4. Are there communities bordering this concession? x Yes __ No

   a. If so, estimated number of people or villages around the concession? 5,000_____

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				
Lion	2 small prides	Many single males	stable	Sight
Leopard	Many, many.	Very difficult to count	stable	sight
Prey species	Sable, hartebeest, buffalo, zebra, eland, warthog, bushpig, and many plains game	Large numbers	stable	sight

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

6. Total employment number: 25_____

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	1	0
Trackers	2	2
Anti-poaching scouts/rangers	14	14
Other anti-poaching	2	2
Cooks/housekeepers	3	3
Community coordinators	1	1
Managers		
Biologists		
Others: _____	2	2

7. Number of staff employed in the off-season: __15_____

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	14	14	
Managers	1	1	
Maintenance			
Road opening/construction			
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: __14_____

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? _Both

   c. Months during which anti-poaching patrols are conducted: _January thru December___

   d. Number of anti-poaching patrols per month: Off Season 2 per month / In season – all _____

   e. Description of anti-poaching equipment, vehicles, etc.: Landcruisers, radio, shotgun, uniforms__

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? _Manager / HR Manager

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

g. Do you offer rewards to poaching informants leading to arrest? X Yes __ No

h. Do you offer rewards to poaching informants upon conviction? X Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? Metical_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	840,000			
Equipment	200,000			
Vehicles	600,000			
Petrol	300,000			
Rewards paid	20,000			
Other: _____				
Other: _____				
TOTALS	2,040,000			

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	30			
Elephant carcasses observed	7			
Lion carcasses observed	0			
Leopard carcasses observed	0			
Ivory poachers arrested	0			
Meat poachers arrested	15			
Other poachers arrested	0			
Poachers convicted	2			
Snares/gin traps collected	900			
Firearms confiscated	0			
Vehicles confiscated	0			
Bicycles confiscated	25			
Boats/nets confiscated	5			
Tusks recovered	0			
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? 20% of Concession fees_____

c. Does the company provide game meat to nearby communities? X Yes __ No

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 3 plus Buffalo, community centers._____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. We do not_____

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? do not_____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Metical___

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements	Bore Hole for water.			450,000 Meticals
Sports teams funded				
Construction materials donated				
Other: _____	Tractor and vehicles			50,000 meticals
Other: _____				
TOTALS				500,000 meticals

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay? 5, 80%, $150,000 US dollars

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015:0 2016:0 2017:0	2015:1 2016:1 2017:0	2015:3 2016:2 2017:1	2015:many 2016:many 2017:many
Percentage of U.S. clients	2015: 2016: 2017:	2015:100 2016:0 2017:0	2015:0 2016:100 2017:0	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _$150,000_____

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

    No females of any species are hunted or harvested

    Only lions of 6 years or older are hunted or harvested

    No pride males are hunted or harvested.

    Dams built for watering of wildlife

14. I declare that the foregoing is true and correct.

    Signature: _(b)(6)_____

    Name: RYAN HERRING Title: PRESIDENT

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] Re: Feb 14 2019 1:15:00; Acknowledgement letter for Permit No. "27005D""

1 message

Management Aut[redacted]ty@fws.gov> Tue, Jun 18, 2019 at 6:43 AM
To: Ryan herring [redacted]
Bcc: emma_nelso

Dear Mr. Herring,

Thank you for your inquiry. Your application, #27005D, that was received on 02/08/2019, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Mon, Jun 17, 2019 at 1:23 PM Ryan herring [redacted] rote:

> I am emailing you to check status of my reques
>
> Ryan Herring
> [redacted]
>
> On Thu, Feb 14, 2019 at 12:15 PM SPITS-II Production Email Messenger <permits@fws.gov> wrote:
>
> > RYAN ANTHONY HERRING1601 SE 60TH STLAWTON, OK 73501U.S.A.***This is an automatically generated email, please do not reply to this message*****For questions please send an email directly to managementauthority@fws.gov ***Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/08/2019; check number 1127 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA27005D-0While processing time may be less, you should anticipate a minimum of 30 days to process your

request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices. While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

Re: [EXTERNAL] Re: See attached app 27005D

Cogliano, Mary <mary_cogliano@fws.gov>
Sun 6/7/2020 11:06 AM

To: John Jackson <jjjiii@att.net>
Cc: Aimee Korver <permits@conservationforce.org>

HI John,

I really appreciate you getting back to me on this!!! It would need to be withdrawn and a new application submitted since our findings are based, in part, on the year and location of the hunt, the operator, etc.. If you can start by **emailing me a new application form**, I'll get the new application in the queue. Since we have not yet started reviewing Mr. Herring's current application (27005D), I will rollover the application fee that Mr. Herring has already submitted (no need to submit additional payment).

In addition to the application form itself, I'll need updated information from the Government of Mozambique. For example, the most current non-detriment finding, etc.. If you're available, perhaps we can discuss this next week to make sure we're clear on the needs from Mozambique.

I hope you're all doing well.

Best regards,

Mary

Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
703-358-1991
USFWS | International Affairs

From: John Jackson <jjjiii@a .net>
Sent: Friday, June 5, 2020 6:43 PM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Cc: Aimee Korver <permits@conserva onforce.org>
Subject: Re: [EXTERNAL] Re: See a ached app 27005D

Mary, client came back to me again and upon further consideration he is rolling over his safari until 2021, not this October. Should he withdraw and refine or amend his application ? John

Sent from my iPad

On Jun 5, 2020, at 4:45 PM, Cogliano, Mary <mary_cogliano@fws.gov> wrote:

Thank you for the update, John!

I hope all of you are well!

Mary

Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
703-358-1991
USFWS | International Affairs

From: John Jackson <jjjiii@a .net>
Sent: Friday, June 5, 2020 5:30 PM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Cc: Aimee Korver <permits@conserva onforce.org>; ryan@herringconstruc oninc.com <ryan@herringconstruc oninc.com>
Subject: [EXTERNAL] Re: See a ached app 27005D

Mary, I spoke with Ryan Herring. He says he still plans to go if he can and hopes to as well. John

Sent from my iPad

On Jun 5, 2020, at 10:42 AM, Cogliano, Mary <mary_cogliano@fws.gov> wrote:

Good Morning, John,

I hope all is well on your end. In looking at the permit application attached, the hunt is planned for October, 2020. Please con irm whether Mr. Herring is still planning to go on this hunt in October, given the situation with coronavirus.

Thank you!

Mary

Mary Cogliano, Ph.D.
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
703-358-1991
USFWS | International Affairs

From: Brisendine, Amy <amy_brisendine@fws.gov>
Sent: Friday, June 5, 2020 10:50 AM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Subject: See a ached app 27005D

see a ached per your request.
<19-02-08_27005d_app.pdf>

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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RENEE SNIDER

February 6, 2019

RCVD FEB 8 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import Application of Zambia Lion Trophy for Frankie Limmer

Dear Chief Cogliano:

Enclosed please find the permit application to import of a lion trophy from Zambia for Frankie Limmer. Also attached to the permit application is the 2018 Operator Enhancement repot from Sitatunga Ranching and Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Frankie Limmer's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6) [redacted]

Name: Frankie Limmer

Date: 1/20/19

RCVD FEB 8 2019

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Lion - Zambia
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual				
1.a. Last name: LIMMER	1.b. First name: FRANKIE	1.c. Middle name or initial: GENE	1.d. Suffix: MR.	
2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address: (b) (6) [redacted]	

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution				
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution			
4.a. *Principal officer Last name*	4.b. *Principal officer First name*	4.c. *Principal officer Middle name/ initial*	4.d. *Suffix*	
5. Principal officer title	6. Primary contact name			
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address	

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address): (b) (6) [redacted]				
1.b. City: TAYLOR	1.c. State: TX	1.d. Zip code/Postal code: 76574	1.e. County/Province: WILLIAMSON	1.f. Country: U.S.A.
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in *Title 50, Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is [illegible] understand that any false statement herein may subject me to the criminal penalties

(b) (6) [redacted]

1/20/19

[illegible]d or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.
   JOHN JACKSON, CONSERVATION FORCE, 504-837-1233
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTHERA LEO

   b. Sex (if known). MALE.

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   ZAMBIA, LUAWATA GMA, CHIPATA

   b. Date wildlife was hunted: JULY 06, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
   SITATUNGA RANCHING AND SAFARIS

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
   PLOT 7301 KAMBALA ROAD
   LIGHT INDUSTRIAL AREA LUSAKA ZAMBIA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: VAL HEATH
Business Name: TROPHY TRACKERS CONSULT
Address: 12A OMELO MUMBA ROAD RHODES PARK
City: LUSAKA
State/Province:
Country, Postal Code: ZAMBIA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   A VERY HEALTHY POPULATION AS THE AREA BORDERS A NATIONAL PARK. ONLY 1 OR 2 MALE LION ARE HARVESTED IN A YEAR. ONLY MALE LIONS OVER THE AGE OF 6 ARE HARVESTED IN ENSURED BY THE COMPANY, THE GOVERNMENT AND WILDLIFE DEPARTMENT.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   LICENSE FEE. $1000
   TROPHY FEE $15000

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   IT IS A CONTRACTUAL OBLIGATION FOR SITATUNGA RANCHING AND SAFARIS TO FUND PART OF THE ANTI POACHING CARRIE OUT IN THE HUNTING AREA, WHICH IS OVERLOOKED BY THE WILDLIFE DEPARTMENT TOGETHER WITH THE COMMUNITY WHO ALSO CARRY OUT ANTI-POACHING FROM ADDITIONAL FEES PROVIDED BY SITATUNGA RANCHING AND SAFARIS SITATUNGA RANCHING AND SAFARIS HAS GONE ABOVE AND BEYOND THE CONTRACTUAL OBLIGATION BY EMPLOYING ADDITIONAL GAME SCOUTS AND PROVIDING VEHICLES TO PATROL THE HUNTING BLOCK.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: (b)(6) [redacted] Date: 1/20/19

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: SITATUNGA RANCHING AND SAFARIS
   a. Years in business: 4 YEARS
   b. Name of company conducting hunt: SITATUNGA RANCHING AND SAFARIS
2. Name of concession: LUAWATA GMA Size in km²: 2200
   a. Land tenure: ✓ Government lease __ Community __ Private ranch __ Private conservancy
   b. Length of concession agreement: 7 YEARS Can it be renewed? ✓ Yes __ No
   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: COMMUNITY INVESTMENT, ANTI POACHING AND COMMUNITY EMPLOYMENT
   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: LUAWATA GMA - LUANGWA VALLEY - CHIPATA NEAREST CITY
   e. If the concession borders a national park, please provide the park name: NORTH LUANGWA
   f. Description of general and distinctive habitat features and any water features: MOPANI WOODLAND, HILLS, HOT SPRINGS
3. Are there any communities living in the concession? __ Yes ✓ No
   a. If so, estimated number of people or villages in the concession? _____
4. Are there communities bordering this concession? ✓ Yes __ No
   a. If so, estimated number of people or villages around the concession? 3000 FAMILIES
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	AVERAGE	2632	UP	GOVERNMENT
Lion				
Leopard				
Prey species				

6. Total employment number: 40
   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	2	-

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Trackers	6	
Anti-poaching scouts/rangers	8	
Other anti-poaching		
Cooks/housekeepers	6	
Community coordinators	1	
Managers	1	
Biologists		
Others: CAMP STAFF	16	

7. Number of staff employed in the off-season: 40

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	FULL TIME
Managers	1	1	FULL TIME
Maintenance	12	12	FULL TIME
Road opening/construction	40	40	PART TIME
Community relations personnel	1	1	FULL TIME
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: COMMUNITY SCOUTS - 60

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? BOTH

   c. Months during which anti-poaching patrols are conducted: EVERY MONTH

   d. Number of anti-poaching patrols per month: EVERY 10 DAYS

   e. Description of anti-poaching equipment, vehicles, etc.: FOOT PATROLS WITH STANDBY VEHI, RADIOS, GPS'S AND FIRE ARMS

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? NATIONAL PARKS, MAGISTRATES, COMPANY & COMMUNITY

   g. Do you offer rewards to poaching informants leading to arrest? ✓ Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? ✓ Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? US $

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
	$15000	$17000	$20000	

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Carcasses observed				
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? ✓ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? BY CONTRACT AND JOLANTARY CONTRIBUTION

c. Does the company provide game meat to nearby communities? ✓ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 16 000 KG OF MEAT TO 1500 FAMILIES. OTHER 1500 RECEIVES FROM NEIGHBORING CONCESSION

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NATIONAL PARKS AND WILDLIFE DEP.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? WILDLIFE DEP.

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? $ 20 000 USD ANNUALLY. COMMUNITY DECIDES WHERE IT IS MOST NEEDED

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)			
-- hunting lion			
-- hunting elephant			

-- hunting leopard			

12. Dollar amount and percentage of the company's revenue from U.S. clients: _____

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

    Signature: _____

    Name: _____ Title: _____

13: WE TRY AS MUCH AS POSSIBLE TO HARVEST OLDER / AGING ANIMALS. WE SPREAD OUT HUNTING OVER THE WHOLE AREA WITH NO SHOOTING POLICIES AROUND CERTAIN AREAS. WE INVOLVE THE COMMUNITY AND EMPLOY AS MANY AS POSSIBLE.
AT THE COMPANY'S OWN EXPENSE WE MAINTAIN AND PROVIDE WATER HOLES SEPERATE TO EXISTING OBLIGATIONS.

THE COMPANY ALSO CONDUCT ADDITIONAL PATROLS IF AND WHEN NEEDED, DESPITE THE HELP AND OBLIGATION TO THE WILDLIFE DEPARTMENT

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0000536

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 21-06-2018 .....

DETAILS OF PERMIT HOLDER

Full name:..... Francis Gene Kimmes ..... NRC/Passport No: (b) (6) .....

Tel/Mobile No..... E-mail address.....

Postal Address: Chilanga Hunting Safaris ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 2. ..... 3.....

Calibre(s) 1.: 375 H&H ..... 2. 300 WM ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0000826 .....

Hunting Type..... Non-Residents .....

is hereby authorised to hunt in ..... Mumbwa ..... Game Management Area,

..... Luwato ..... Hunting block for ..... days from.....

to..... (Dates inclusive)

Amount Paid..... $150 .....

GRZ Receipt No. 0004032

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
21 JUN 2018
LICENSING
PRIVATE BAG 1, CHILANGA, ZAMBIA.

Official Stamp

C. Nkumuya

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

Original

LEON / LIMMER

NPW FORM 2

0000878
S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue..... Chilanga ..... Date of Issue..... 6/7/18

DETAILS OF LICENSEE

Full Name..... FRANKIE G. LIMMER ..... NRC No./Passport No..... (b) (6) [redacted]

Nationality..... AMERICAN ..... Age.....

Tel/Mobile No:..... E-mail.....

Full Name of Safari Company:..... Sitatunga Safaris .....

Certificate of Incorporation No. ..... Date of Incorporation.....

Postal Address..... Box ..... HSK ..... Residential Address.....

Firearm Licence/Tourist Firearm Import No..... Calibre of Firearm..... .375 .....

Type of Hunt.....

Any other relevant information, which may be considered in support of this application (e.g, previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Lwawata	2018	4200
			0000132		
			0043532		

Total Animals fees paid - the kwacha equivalent of ..... US$ 4200
Concession Fees paid - the kwacha equivalent of ..... US$ —
Grand Total the kwacha equivalent of ..... US$ 4200

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
06 JUL 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

May 7, 2019

In Reply Refer To:
FWS/AIA/DMA/PRT-27008D

Enhancement Finding
Applicant: Frankie Gene Limmer (PRT-27008D)

Frankie Gene Limmer submitted an application on February 8, 2019, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken on July 6, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Limmer's application involving a *P. l. melanochaita* sport-hunted trophy taken in Luawata GMA, Chipata, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Limmer's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Limmer's participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Limmer's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Limmer's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Limmer will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Limmer, in managing the lion populations in GMAs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Limmer.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Frankie Gene Limmer.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Ph.D, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA27008D-0
Effective: 05/07/2019 Expires: 05/06/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:
FRANKIE GENE LIMMER
(b)(6) [redacted]
TAYLOR, TX 76574
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD FEB 13 2019 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Jurgens	Travis	James	Mr

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.c. City	1.d. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Prineville	Oregon	97754	Crook	United States

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
Same as above

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

(No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

11/9/19

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Travis Jurgens, (b) (6) Prineville, Oregon 97754

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Travis Jurgens (b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthero Leo, Lion

b. Sex (if known). 1 Male, 1 Female

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

South Africa, Northwest Province, Farm: Sandhurst Portion 1, R137 Tosca/ Bray Road, Tosca Town 8618, Vryburg District

b. Date wildlife was hunted:

July 5, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Lew Harris Safaris, Morgan Harris

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Moredow Taxidermy, R34 Vryburg Road, Schweizer-Reneke, 2780, Vryburg District, Northwest

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Please see attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name: ~~Unknown at this time~~ Moredow Taxidermy
Address: Farm Moredow
City: Schweizer-Reneke
State/Province: Northwest 2780
Country, Postal Code: South Africa 2780

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Estimated 25,000 in the country to include in captivity and in the wild

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Permit fee $170.00 to office in Nortwest. Trophy fees to outfitter and landowner $27,500. These funds were used to provide jobs for people in the local community such as trakers, skinners, cooks, maids, maintenance people and so on. The funds were also used to enhance habitat by providing/ creating addtional watering holes. Funds were also used to assist with anti-poaching patrols.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

The funds were also used to enhance habitat by providing/ creating addtional watering holes. Funds were also used to assist with anti-poaching patrols.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b)(6) _____ Date: 1/29/19

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Portland, OR
PDX

DRSM 00575/6/2018 NW 3606/06/2018 Application ID 3606

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt, Release .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act, Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No.12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974.

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details
Surname: Jurgens
Name: Travis James
Id Number:
Passport: (b) (6)
Cell Home:
Tel Home:
Tel Work:
Fax Home:
Email: sabrina@tinashegroup.co.za

Physical Address
Building:
Street: (b) (6)
Suburb: Prineville
Town: Oregon
Area Code: 97754
Division/Region:
Province/State:
Country: United state of America

Postal Address
Post Office:
Town:
Postal Code:
District/Region:
Province/State:
Country:

REGION
NorthWest

LOCATION

Facility

Property
Property Name: Sandhurst Portion 1
Building: Tinashe
Street: R137 Tosca / Bray Road
Suburb: Tosca
Town: Tosca
Area Code: 8618
Division/Region: Vryburg District
Province/State: North - West
Country: South Africa

CONSERVATION PERMIT OFFICE
NW WEST PROVINCE
20 Jun 2018, 11:38 AM
7819 Mmabatho 2735
Tel: +27(0)18 389 5448

Stamp of Issuing authority

VALIDITY PERIOD
FROM 27/06/2018 TO 26/06/2019

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority
(Bonho Manganye)
20 Jun 2018, 11:38 AM

Signature of Permit Holder
(Travis James Jurgens)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

DRSM 00575/6/2018 NW 3606/06/2018 Application ID 3606

PROPERTIES

Name	Town	Province	Country
Sandhurst Portion 1	Tosca	North - West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	2	Both (Male and/or Female)	1 Brown Male 1 Brown Female

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
George Clayton Fletcher	PH-105/12/2017NW	0823393124	0823393124

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
George Clayton Fletcher	HO-045/12/2017NW	0823393124	0823393124

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
Travis James Jurgens	(b) (6)	29/06/2018	02/07/2018	(b) (6) , Prineville, 97754, Oregon, Oregon, United States of America

OTHER PARTIES INVOLVED

Full Name	ID Number	Contact	Involvement	Physical Address
Hilgard Kotze		Cell:0827845269	Transport 1 Hunted Male lion ,1 Female Trophy to the taxidermy	Moredow Taxidermy, R34 Vryburg Road, Schweizer - Reneke, 2780, Vryburg District, North - West

ACTIVITIES

Activity Name
Hunt
Release

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Directorate Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, is only valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This permit is valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the specified methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This permit is only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signature of the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permit at any time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt thereto, whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered, lost or destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal, plant or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protected Area, National Park, Provincial Nature Reserve or privately owned land and : - a) the permit holder must beforehand obtain all other relevant written permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this permit, have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized person. 12) An authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this permit, record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register related to the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after performing or completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Issuing Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the permit together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as long as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall apply for the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date thereof. 17) Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback report has been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to: - a) all applicable norms and standards in existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to which this permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or changes thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By signing this

Signature of Issuing Authority
(Borho Manganye)
20 Jun 2018, 11:38 AM

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Postal Address: Private Bag X 15, Mmabatho, 2735

permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or failure to render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. b) if the permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fees paid to the Issuing Authority for the issue of this permit shall not be

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is used to hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a period of twenty four (24) months prior to the hunting thereof. e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this regard.

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or catch any wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm having a barrel of a caliber of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhinoceros, hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written permission as prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as prescribed in applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any hunting organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties assisting the permit holder.

Signature of Issuing Authority
(Borho Manganye)

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CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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RENEE SNIDER

February 11, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD FEB 22 2019

RE: Import Application of Zambia Lion Trophy for Chris Elder

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zambia for Chris Elder. Also attached to the permit application are Operator Enhancement Reports for Nyamvu Safaris and Mopane Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others in making an enhancement finding for lion imports.

Sincerely,

John J. Jackson III

encl:

- Chris Elder's Lion permit application, 100.00 check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6) [redacted]

Name: Chris Elder

Date: 2-8-19

RCVD FEB 28 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Zambia - Lion

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A.	**Complete if applying as an individual**		
1.a. Last name: Elder	1.b. First name: Chris	1.c. Middle name or initial: L.	1.d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address: (b) (6) [redacted]

B.	**Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**		
1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C.	**All applicants complete address information**			
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address): (b) (6) [redacted]				
1.b. City: Springdale	1.c. State: AR	1.d. Zip code/Postal code: 72764	1.e. County/Province: Washington	1.f. Country: USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D.	**All applicants MUST complete**
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))
2.	Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1 (b)(6) [redacted]
	Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John J. Jackson III, Conservation Force, CF@conservationforce.org, 504-837-1233

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   P.I. melanochaita (African Lion)

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   S. Luangwa, Zambia in Nyamvu, Operator Nyamvu and Mopane Safari

   b. Date wildlife was hunted: 7/27/2018-8/17/2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   Ivory Safaris, Jeff Rann

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Michael Borman, Bangweulu Taxidermy, 4412 K Chifwema, New Kasama, Lusaka Southern Zambia, 50100

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Michael Borman,
Business Name:	Bangweulu Taxidermy,
Address:	4412 K Chifwema,
City:	New Kasama,
State/Province:	Lusaka Southern Zambia, 50100
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ (b)(6) _____ Date: _____

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

NYAMVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: ZAID137@HOTMAIL.COM

I. DESCRIPTION OF COMPANY AND CONCESSION

Nyamvu Safaris, Ltd. has been operating Nyamvu Game Reserve since April 2005. The Game Reserve provides habitat for a range of species including lion, kudu, leopard, buffalo, and elephant and is also a None Fenced Game Reserve but open and wild like all other hunting blocks in Zambia. The Game Reserve is in Nyimba District in Eastern Province of Zambia. The Area is along the Luangwa River. Nyamvu Safaris has entered into a Long term project with the Wildlife Authorities to try and develop a Game Reserve for Animals for a period of Ninety Nine years.

The Director of Nyamvu Safaris is Mr. Zaeed Patel. Nyamvu has permanent employees who work throughout the year and are on two year contracts that are renewable. The camp has a resident Professional Hunter and a camp Manager. Other employees include four game trackers, nine anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). We estimate a total of about 113 people to be direct beneficiaries from Nyamvu Safaris employees. These beneficiaries come from the local community.

When Nyamvu Game Reserve was acquired in 2005 the Area was completely depleted such that even seeing an Impala was almost impossible. It had to take frantic efforts by Mr. Zaeed Patel to begin the Anti-Poaching Patrols and then creating water points for animals to access water easily. Slowly the animals started coming back to Nyamvu Game Reserve and as we speak today after 10 years of progressive anti-poaching and creation of suitable conditions for Animals Nyamvu is now home to most of the wild species of Southern Africa including Elephant, Lion and Leopard. The director of Nyamvu has even carried out a restocking exercise of Sable Antelope which originally was not there. We can confirm that Nyamvu now has enough sable that can even be included on Safari Quota to be hunted. The restocking exercise is not only limited to sable only but other species as well.

Among the many efforts done to improve the number of animals in Nyamvu include provision of salt Leaks, provision of Maize Bran, creation of Dams for easy accessibility of water are among the many efforts done to create suitable conditions for Animals to stay in Nyamvu.

We further wish to put it on record that Nyamvu Game reserve is an Area where the director has invested heavily to make it what it is today. The Area was not hunted for about three years from 2005 when it was acquired to about 2008. In all these years the director was merely investing in Anti-poaching patrols, creation of water points among other things to attract game. This is the kind of effort that was invested in this None Fenced Game Reserve to ensure that we have enough stocks of animals.

Safari Hunting was therefore introduced to help with the conservation and income generation for the area and for the help of re-building. In order to make the community benefit from such animals it was agreed that some revenue can be derived from selling these animals on Safari and the revenue can be used to improve the welfare of the surrounding communities.

We can confirm that Schools, Clinics, Bridges, Grave Roads have been built in the surrounding communities of Nyamvu Game Reserve through the revenues raised from Safari Hunting. The chief has equally had a fair share of some benefits through the construction and periodical renovations of the chief's palace and grading of the road which leads to the palace. Nyamvu further purchased Banana Boats that are used by villagers in the community to cross the Luangwa River when trying to access the other side of the River. School Children, Community health workers are among the beneficiaries who use the Banana boat to cross the Luangwa River.

II. ANTI-POACHING COMPONENT

Nyamvu Safaris maintains three groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

Nyamvu Safaris spends about $ 26000 on average per annum to carry out Anti-poaching patrols in the Game Reserve. A total of between 300 and 350 days is recorded per annum. 3000 liters of diesel are used on average per annum which is consumed by 2400 hours of patrol hours. The amount spent on payments for rewards after abducting poachers has been steadily decreasing from 2005 although an average of about 2800 dollars is spent per annum in rewards. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5650	Directly paid and some subsidies to WA
Scout equipment	9450	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	3900	For scouts and WA
Rations for WA and community scouts	3800	
Rewards	2800	For information and arrests
TOTAL	$ 25600	

In the Picture Below two poachers that were apprehended by our Vigilant Scouts.

COMMUNITY PARTICIPATION

A. Community Assistance Component

The agreement that Nyamvu Game Reserve has with the community does not specify what amounts need to be contributed to the community. However on Average, Nyamvu contributes about $ 20000 per annum.

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages.

A hammer mill donated to the community by Nyamvu Safaris

B. Conflict Control

Our problematic animals are mainly the Lions and Elephant. Attached are extracts from the media which confirm Lions attacking Human Beings in Nyimba District of Eastern province where Nyamvu Game Reserve is situated. Management of Nyamvu Safaris has set aside a fund which is used to compensate victims of such unfortunate circumstances. The fund is usually 5000 dollars but can be adjusted depending on the number of such occurrences in a particular year.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $5000 to maintain per annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the Game Reserve by finding water resource. This usually attracts Lion and Leopard to come and hunt in the game Reserve.

V. OTHER INFORMATION

A. Prey Base

Nyamvu Safaris has been monitoring the population growth of the Lion and Leopard which is a result from efforts done so far such as anti-poaching efforts, water provision, and fire management.Nyamvu Safaris will further engage the wildlife Authorities in Monitoring the resources on the ground by position cameras in strategic Areas so as to monitor the Activities of the Lion and Leopard.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lon in our Area. As at now we use Lion tracks and foot prints. Sightings by individuals and just the a few cameras which we use to monitor the size and age for Lion and Leopard when Hunting.

C. Elephant Hunting

Our area is endowed with some very good Elephant hunting and due to the long term conservation plan produces good quality tusks now of between 50 and 60 pounds. Our well-coordinated anti-poaching system has made poaching of Elephant in Nyamvu very difficult. The community has also assisted management at Nyamvu by bringing reports of members of the community that have links with suspected poachers and stringent measures have been taking which include imprisonment for those that were found guilty of poaching. Through our various anti–poaching awareness programs with the community we have managed to make the community assist to guard this natural resource jealously. Nyamvu Safaris maintains a policy of not taking any Elephant whose tusks are weighing 20 kilograms and below.

E. Lion Aging Approach

We use the Lion aging approach when conducting Safari Hunting for Lion. Earlier on we mentioned of Human Animal conflicts mainly with Lions. This can be managed by removing the older Lions in the system through Safari Hunting. It has always been a Policy for Nyamvu Safaris not to harvests any Lions or Leopard which are not old enough to have outlived their useful life. In view of this approach not more than five Lions have been taken in Nyamvu game Reserve from the time Safari Hunting was introduced.

F. U.S. Hunters

It is of no doubt that this is the most sought after market with regards to Safari Hunting in Zambia. Nyamvu Safaris has had a number of clients donating equipment and in some instances funds for Anti –poaching programs. This can confirm to you that these hunters are not only after fulfilling their interests but to also allow the community to benefit through a conservative based approach to Safari Hunting.

CONCLUSION

Nyamvu Safaris can proudly confirm that the project which it started in 2005 has been a success looking at the way the numbers of wildlife has increased in our game reserve. We recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: (b)(6)

Operator Name: Zaeed Patel

Title: (b)(6)

MOPANE SAFARIS, LTD.
Address, 515 FRANCISTOWN ROAD LIVINGSTONE
Operator email: karimtd@yahoo.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Mopane Safaris, Ltd. has been operating in Luembe-West Petauke Concession since April 2015. The concession provides habitat for a range of species including lion, kudu, leopard, buffalo, and elephant. The concession is in Eastern Province of Zambia. The Area is along the Luangwa River and is about 3227 square kilo meters in connection and conjunction with Nyamu Game Reserve our other area. The Area is classified as Secondary Hunting Area. Mopane Safaris has entered into a Ten Year Lease agreement with the wildlife Authority and is renewable subject to conducting successful conservation records of the Ecological system.

Our company is a Limited Company whose Directors are Mr. Saeed Omar Abdul Karim and Mr. Chishimba Mumba. This concession was acquired in April 2015. In view of this Mopane Safaris has one resident Professional Hunter who also provides the functions and duties of a Camp Manager. Other employees include, four game trackers, twelve anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). We estimate a total of about 215 people to be direct beneficiaries from Mopane Safaris employees. These beneficiaries come from the local community.

We very much welcome the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy School necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from Hunting of Cats and Elephant. With this in mind Mopane Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti–poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mopane Safaris maintains four groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

Fig I. Director and Resident Professional Hunter of Mopane Safaris Mr.Karim (Center) planning the Anti-Poaching Patrols with a wildlife officer and a member from the community.

Fig ii. In the Picture below some Ivory Tusks recovered from Poachers and weapons used for poaching.

In 2015, Mopane Safaris spent almost $ 30900 in Luembe-West Petauke Consession on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 1450 liters of diesel for patrol vehicles. We recorded 328 patrol days and well above 1968 patrol hours. We also made over $ 2005 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	11900	Directly paid and some subsidies to WA
Scout equipment	12450	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	1885	For scouts and WA
Rations for WA and community scouts	7800	
Rewards	2005	For information and arrests
TOTAL	$ 36040	

The concession agreement has a clause which requires Mopane Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2025 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $ 25900 annually as per agreement which was entered into 2015 by Mopane Safaris, the Community and the Wildlife Authorities.

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages. In 2015 the value was $ 24371.

Fig iii. Resident Professional Hunter and Director attending a community Meeting.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers and Human Animal conflict from Lions. $ 12000 has been set aside for compensation purposes when we have such occurrences. In 2015 we paid $ 1000 in compensation to maize fields that were damaged by Elephants to grain fields for Villagers. We further compensated a family whose member was attacked and killed by an Elephant and was one of our Village Scouts who had gone out of camp and on returning to camp the incident occurred. The total cost for compensation and funeral arrangements was $ 2500

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $5000 to maintain in 2015 and 2016 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource. The concession is along the Luangwa River and this makes it have smaller streams flowing in the concession creating more water points for animals. As a result we have a lot of Game in our concession which attracts Lion, Elephant and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mopane Safaris in Luembe-West Petauke is still monitoring the population growth of the Lion, Leopard, Elephant and other species which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mopane Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by position cameras in strategic Areas so as to monitor the Activities of the Game and Cats. Luembe is a secondary Area and as such we have applied more concerted efforts aimed at mitigating the impact of poaching that had characterized the Area for the years when we were not operating in the Area.

We also engaged the wildlife authorities to regulate resident Hunting by proposing that resident Hunting be temporarily stopped for five years so as to give room for animals to breed so as to improve the numbers in the Eco system in Luembe Game Management Area.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lon in our Area. As at now we use Lion tracks and foot prints. Sightings by individuals and just the a few cameras which we used this year to monitor the size and age for Lion and Leopard.

C. Lion Aging Approach

Like other Safari Companies we have been following an age-based policy for African lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities, and to be conservative in estimating age.

A number of potential Lion Trophy were not hunted this year because of our company policy and selectiveness.

Our approach as a company from 2015 until 2025 when our concession will be due for renewal is to hunt Lion which has reached an advanced and mature age only of 6 years and above.

D. Elephant

Elephant Hunting in Luembe is also one of the High Income earners. Mopane Safaris is alive to the fact that Ivory is of high value on the world market and is on high demand in particular the Far East. Mopane Safaris therefore has put up a robust Anti-Poaching program to protect this rare species. In view of this we have a policy as company not to harvest any Elephant with Tusks weighing below 20 kilograms. We recognize the fact that it may be difficult to judge but we expect the Professional Hunters to exercise caution and use their judgment before allowing a client to hunt one. Professional Hunters have been given an allowable allowance of 1 kg so as not to go below the recommended threshold by the wildlife authorities of 15 Kilograms as a minimum shoot able size Elephant.

E. U.S. Hunters

Most of our clients are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching of our community compensation fund or community assistance programs.

CONCLUSION

Mopane Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion, Leopard and Elephant and we recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: [redacted]

Operator Name: Saeed Karim

Title: Director

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30117D / Lion Trophy Import / Chris Elder

John J. Jackson, III <jjj@conservationforce.org> Wed, May 22, 2019 at 4:20 PM
To: (b)(6)
Cc: darcy_vargas@fws.gov

Chris,
Please scan and send the permit application to USFWS.
Please also send the date the lion was taken.

Thanks,
John

-------- Forwarded Message --------
Subject: Application # 30117D / Lion Trophy Import / Chris Elder
Date: Wed, 22 May 2019 16:03:11 -0400
From: Vargas, Darcy <darcy_vargas@fws.gov>
To: John J. Jackson, III <cf@conservationforce.org>

Dear Mr. Jackson,
Ref: 30117D; Import of Mr. Chris Elder's lion trophy import, from Nyamvu GMA, S. Luangwa, Zambia, taken between July 27, 2018 and August 17, 2018.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide a copy of the Zambia licenses/permits authorizing Mr.Elder's lion hunt.

2. Since the hunt already occurred, please provide the exact date that the lion was taken/hunted.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by _June 6, 2019_ (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas

Biologist

US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

www.fws.gov <http://www.fws.gov/>

www.cites.org <http://www.cites.org/>

/Sign up <http://visitor.r20.constantcontact.com/d.jsp?llr=m55c7tjab&p=oi&m=1109842295756&sit=xuh7is8gb&f=e7b4b07a-db5e-4e42-a2db-9b122d99f7b2> for our e-newsletter to learn how we're working around the globe to protect species and their habitats!/
*/
/*
[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30117D / Lion Trophy Import / Chris Elder

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 4:03 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Mr. Jackson,

Ref: 30117D; Import of Mr. Chris Elder's lion trophy import, from Nyamvu GMA, S. Luangwa, Zambia, taken between July 27, 2018 and August 17, 2018.

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Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

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BISON CONNECT

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30117D / Lion Trophy Import / Chris Elder

Vargas, Darcy <darcy_vargas@fws.gov> Tue, Jun 11, 2019 at 3:22 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Mr. Jackson,

Ref: Zambia lion trophy import application / Chris Elder

I am in receipt of a voicemail from someone named Rachel asking for the status of Mr. Elder's application. However, Rachel's name was not included on the application as an approved contact so I am emailing you the status update.

The status of the referenced application is that we are still pending a response to our May 22, 2019, email request for additional information. The additional information was due by June 6, 2019 (within 45 calendar days). Therefore, if a copy of the Mr. Elder's Zambia hunting licenses/permits and hunt date are not provided by Monday, June 17, 2019 (1 week from today), the application will administratively closed.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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---------- Forwarded message ---------
From: **Vargas, Darcy** <darcy_vargas@fws.gov>
Date: Wed, May 22, 2019 at 4:03 PM
Subject: Application # 30117D / Lion Trophy Import / Chris Elder
To: John J. Jackson, III <cf@conservationforce.org>

[Quoted text hidden]

United States Department of the Interior
FISH AND WILDLIFE SERVICES

Falls Church, VA 22041

August 1, 2019

Chris Elder
(b)(6)
Springdale, AR 72764
U.S.A.

Dear Mr. Elder:

On May 22, 2019, an email was sent to your application contact, Mr. John Jackson with Conservation Force, requesting additional information in regard to your application PRT-30117D. In that email, Mr. Jackson was informed that you needed to respond to the request within 45 calendar days, which was by July 6, 2019. However, on June 11, 2019, we send a courtesy reminder email and added an extension of time to submit a complete application through June 17, 2019, or your application would be abandoned. Since we have not received the requested information, we have abandoned your application, and your application has been administratively closed.

If, in the future, you wish to pursue the activity for which you originally applied, you will need to submit a new application, along with any appropriate fees, to this office. Please be aware that in most cases, we will not "transfer" information from your old application to a new application. All relevant information would need to be supplied at the time a new application is submitted.

If we can be of assistance, you may contact our office at 703-358-2104 or fax 703-358-2281.

Sincerely,

Permit Biologist
Division of Management Authority

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30117D / Lion Trophy Import / Chris Elder

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 4:03 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Mr. Jackson,

Ref: 30117D; Import of Mr. Chris Elder's lion trophy import, from Nyamvu GMA, S. Luangwa, Zambia, taken between July 27, 2018 and August 17, 2018.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide a copy of the Zambia licenses/permits authorizing Mr.Elder's lion hunt.

2. Since the hunt already occurred, please provide the exact date that the lion was taken/hunted.

In accordance with 50 CFR 13.II(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
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www.cites.org

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

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RCVD FEB 28 2019

February 11, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Richard Gardner's Permit Application for a lion trophy from the Republic of South Africa

Dear Chief Cogliano:

Enclosed is the permit application to import a lion trophy from South Africa for Richard Gardner. Also attached to the permit application is a Kwazulu Private Game Reserve Management Plan on Lions. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others in making an enhancement finding for lion imports

Sincerely,

John J. Jackson III

encl:

- Richard Gardner's Lion Permit Application, Notice of Representation and check

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD FEB 28 2019

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Lion - Republic of South Africa

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Gardner	Richard	M	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Reno	NV	89511	WASHOE	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ac[illegible]derstand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 100[illegible]

(b)(6) [redacted]

02/12/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John J. Jackson III, CF@conservationforce.org, Conservation Force

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panther Leo

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   Kwazulu Private Game Reserve, Republic of South Africa. -27.59213 Latitude
   31.68324 Longitude

   b. Date wildlife was hunted: 9/26/2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   Professional Hunter - Eugene Alberts

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Life-Form Taxidermy, 7 Aluminium Street, White River, South Africa, 1240

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Life-Form Taxidermy
Address:	7 Aluminium Street
City:	
State/Province:	White River, South Africa, 1240
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   Please see the attached Kwazulu Private Game Reserve Management Plan on Lions.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   Please see the attached Kwazulu Private Game Reserve Management Plan on Lions.

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   Please see the attached Kwazulu Private Game Reserve Management Plan on Lions.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw [redacted] States, cannot be re-exported.

    Applicant's signature: [redacted] Date: 2/12/2019

    Be aware that there may be a[redacted]equirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: Richard Gardner

Date: 2/12/2019

04 June 2018

To whom it may concern,

Application for an import permit for a lion trophy to the United States of America

Included herein are the details relating to the origin of the trophy, game reserve where the animal will be hunted and their management policy.

Kwazulu Private Game Reserve is an 18 000 ha property and is located in the north-east of KwaZulu-Natal Province in South Africa, which was established in 2001. The reserve comprises of Zululand Thornveld, Lowveld as well as Grassveld and accommodates all indigenous game species including the Big 5, with a current lion population of 20 lions, consisting of 12 males and 8 females.

The surrounding communities comprises of low-skilled individuals whose unemployment rate is currently very high. The running cost of the reserve is extremely high and the proceeds of hunting are utilised to maintain the reserve and machinery, employment (supporting local families) and species population management.

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All the animals roam free on the 18 000 ha reserve, the lions hunt for themselves and there is no feeding of predators involved. All hunting takes place on the basis of fair chase, walk & stalk. The first lions were introduced in 2004 from Mkuze Falls Game Reserve, wild populations, to enhance the sustainable utilisation through hunting of selected species. Genetic management of small populations is critical to maintain genetic heterozygosity and therefor removals and introduction of new genetics form part of Kwazulu Private Game Reserve's Predator Management Plan. All species introduced originate from wild populations.

KWAZULU PRIVATE GAME RESERVE (PTY) LTD. – P.O. BOX 591 PONGOLA 3170
VAT NO: 4030205217 / COMPANY REGISTRATION NO: 2001/018212/07
TEL: 034 414 1085 / CELL: 083 845 5537 / FAX: 034 414 1389 / EMAIL: kwazulugame@gmail.com
DIRECTOR: JM QUELLHORST

The reserve has an anti-poaching team responsible for the protection of all wildlife which comes at a high cost to the company. Dr Mike Toft is the attending wildlife veterinarian and is responsible for all the testing, translocating, and veterinary procedures required. Miss Karen Holmes is the wildlife ecologist contracted to advise on all aspects relating to wildlife and habitat management.

Kwazulu Private Game Reserve possesses a Certificate of Adequate Enclosure as well as a Predators Management Plan approved by Ezemvelo KZN Wildlife, the Provincial Conservation Authority. All permit requirements, provincial, national and international are complied with.

Please find attached US Fish & Wildlife permit application as well as the hunting permit issued by Ezemvelo KZN Wildlife. The Department of Environmental Affairs will only issue the export permit once the recipient country has issued the import permit.

Please feel free to contact me should you require any further information or Ezemvelo KZN Wildlife for verification.

JW Scribante (General Manager)

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VAT NO: 4030205217 / COMPANY REGISTRATION NO: 2001/018212/07
TEL: 034 414 1085 / CELL: 083 845 5537 / FAX: 034 414 1389 / EMAIL: kwazulugame@gmail.com
DIRECTOR: JM QUELLHORST

Kwazulu Private Game Reserve Lions 2001 - 2017							
Year	OP	From	Hunted	Mortality	Destruction	Purchases - Male	Purchases - Female
February 2001	25013/2001	Thorny Bush GR				1	3+4
November 2007	4482/2007	Mkuze				1	
November 2007	4387/2007	Thanda Private GR					2
September 2010	4065/2010	Thanda Private GR				1	
May 2011	1999/2011	Munyawana GR				1	
October 2011	4460/2011	Nietverdiend, North West				2	
March 2012	1127/2012	Nambiti Private GR					2
February 2014	598/2014	Munyawana GR				1	
March 2015	1150/2015, 1650/2015	Thanda Private GR				1	
March 2015	1269/2015	Welgevonden GR					1
May 2015	1826/2015	Welgevonden GR				5	
July 2015	2944/2015	Grahamstown				1	
August 2016	3292/2016	Thanda Private GR				1	
October 2016	3937/2016	Tembe Elephant Park				2	
April 2017	1379/2017	Nambiti Private GR				2	3
June 2013	2952/2013			1 x Male Cub			
June 2011	2477/2011				2 x Cubs, 1 x Female		
May 2012	2103/2012				2 x Female		
April 2014	1774/2014				2 x Female		
August 2014	3641/2014				1 x Male		
November 2014	5127/2014				1 x Male		
March 2017	1037/2017				1 x Female		
July 2009	3046/2009		1 x Male				
September 2011	4109/2011		1 x Female				
June 2012	2708/2012		1 x Male				
June 2013	2780/2013		1 x Male				
March 2012	1020/2012		1 x Male				
January 2013	285/2013		1 x Female				
September 2014	4297/2014		1 x Male				
May 2015	1938/2015		1 x Male				
May 2016	1731/2016		1 x Male				
May 2016	1732/2016		1 x Male				
June 2016	2365/2016		1 x Male				
August 2016	2952/2016		1 x Female				
August 2016	2953/2016		1 x Male				
August 2016	2954/2016		1 x Male				
September 2016	3671/2016		1 x Male				
November 2016	4216/2016		1 x Male				
March 2017	1337/2017		1 x Female				
March 2017	1339/2017		1 x Female				
April 2017	1355/2017		1 x Female				
May 2017	1911/2017		1 x Female				

Barry, Anna <anna_barry@fws.gov>

Richard Gardner PRT #30120D (South Africa)

1 message

Barry, Anna <anna_barry@fws.gov> Fri, Sep 27, 2019 at 1:09 PM
To: "Emma C. Sampson" <permits@conservationforce.org>
Bcc: Emma Nelson <emma_nelson@fws.gov>

Hello Emma,

This application is still pending, but we are processing them as fast as we can.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Sep 27, 2019 at 11:41 AM Emma C. Sampson <permits@conservationforce.org> wrote:

> Dear Ms. Barry,
>
> I write to check on PRT# MA 30120-D-0 for Mr. Richard Gardner. This was mailed out to FWS on or about February 11, 2019.
>
> Would you be so kind to give us an update, please.
>
> Thank you,
>
> ***Emma C. Sampson***
> **CONSERVATION FORCE**, *Permits Division*
> 3240 S I-10 Service Road W
> Suite 200
> Metairie, LA 70001-6911
> p. 504-837-1233

e. permits@conservationforce.org
www.conservationforce.org

BISON CONNECT

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] Import Permit Status Inquiry - PRT # MA30120D-0

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Jun 6, 2019 at 11:07 AM
To: Rick Gardner <RGardner@gardnereng.com>
Bcc: emma_nelson@fws.gov

Dear Mr. Gardner,

Your application, # 30120D, that was received on February 28, 2019, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Tue, Jun 4, 2019 at 12:32 PM Rick Gardner <RGardner@gardnereng.com> wrote:

> Gentlemen,
>
> Could I please get a status update on my African Lion Import Permit application received by the Division of Management Authority on 02/28/2019?
>
> Thank you for your time,
>
> Also, in my PRT notification e-mail from you, the address listed for me has a typo and should read:
>
> [redacted], Reno, NV 89511 and not “Edmunds Dr.” as listed. Could this please be corrected so there are not mailing of my permit.

Again, thank you.

RICK

Richard M. Gardner, P.E., LEED® AP

Vice President

GARDNER ENGINEERING, INC.

P.O. Box 1207

Reno, NV 89504

PH: (775) 329-4133

FX: (775) 329-4564

Nelson, Emma <emma_nelson@fws.gov>

Richard Gardner PRT #30120D (South Africa)

1 message

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Bcc: emma_nelson@fws.gov

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Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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> **CONSERVATION FORCE**, *Permits Division*
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> p. 504-837-1233

e. permits@conservationforce.org
www.conservationforce.org

[EXTERNAL] Supplement for Richard Gardener Import Permit Application # 30120D

Aimee Korver <permits@conservationforce.org>

Tue 6/30/2020 2:02 PM

To: Nelson, Emma G <emma_nelson@fws.gov>; John Jackson, III <jjjiii@att.net>; rgardner@gardnereng.com <rgardner@gardnereng.com>

1 attachments (882 KB)

SupplementRichardGardner#30120D.pdf;

Ms. Nelson,

Attached you will find supplemental information that we wish to add to Mr. Gardner's existing import permit application # 30120D.

Please let me know that you have received these documents and if you have any questions.

Kindest Regards,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
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CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

June 30, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Emma Nelson
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: emma_nelson@fws.gov

RE: PRT # 30120D, Applicant Richard Gardner- Lion from R.S.A.
Supplement to Existing Application

Ms. Brisendine:

This is a supplement to the existing application, Prt # 30120D for applicant Richard Gardner for his sport-hunted lion trophy from the Republic of South Africa.

Attached are the hunting permits/ licenses for Mr. Gardner's safari.

Also included is a letter regarding the Kwazulu Natal Lion meta-population and the recognition of them falling in the Managed Wild category.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Richard Gardner w/attachments

Enclosures:
a. Hunting Permits
b. KZN Lion Metapopulation Management letter

3240 S I-10 Service Road W, Suite 200 • Metairie, Louisiana 70001 • USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

ORIGINAL

EZEMVELO
KZN WILDLIFE

ORDINARY PERMIT

Fee: R 1 100.00 Permit No: OP 3709/2018
Receipt No: 3918/2018 Contact: Miss S.M. Hughes

This permit is issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004; and in pursuance of the provisions of the Nature Conservation Ordinance No 15 of 1974 , Chapter 3 and the Regulations framed thereunder.

The permit is issued to:

Passport: 526133030

Richard Monroe Gardner
c/o"KwaZulu Private Game Reserve"
P.O.Box 591
Pongola
3170

Residential Address
c/o"KwaZulu Private Game Reserve"
Vergelegen Fam
Magudu
Pongola
3170

Conservation District: Paulpietersburg
Province: KwaZulu-Natal

In the capacity of Hunting Client
To Hunt the following species of Game

LION *(PANTHERA LEO)*
1 (One) Male

Hunting Client:
R.M Gardner
Passport: 526133030

Residential: 16055 Edmonds Drive Reno
Nevada,89511
United States of America

Postal: 16055 Edmonds Drive Reno
Nevada,89511
United States of America

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 12 September 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE
PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal
Tel +27 33 845 1320 / 1324. Fax: +27 33 845 1747. Fax to Email: 086 529 3320
Email: permits@kznwildlife.com. Website: www.kznwildlife.com

EZEMVELO
KZN WILDLIFE

ORIGINAL

Professional Hunter:
Mr E P Alberts
ID Number: 8007085005087

Residential: 20 Booysen street
Modimolle
Limpopo
0510

Postal: P.O.Box 857
Modimolle
Limpopo
0510

Hunting Outfitter:
Mr E P Alberts
ID Number: 8007085005087

Residential: 20 Booysen street
Modimolle
Limpopo
0510

Postal: P.O.Box 857
Modimolle
Limpopo
0510

Weapon: Rifle **Hunting Method:** Walk & stalk

TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED

1. It is valid only:
   (i) from : 12 September 2018
   to : 30 October 2018
   (ii) in the original
   (iii) if all 4 pages are signed by the permit holder named above
   (iv) to the permit holder named above
2. By signing the permit or licence the holder accepts, and agrees to comply with the conditions under which it is issued.
3. This permit is not transferable
4. Any unauthorised alteration to this permit shall render it invalid
5. This permit is valid only within the province where it was issued
6. The holder of the permit shall, at the request of a person authorised in terms of applicable legislation so to demand, forthwith produce such permit to such person.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 12 September 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE™

ORIGINAL

7. This permit shall be invalid until such time that it is signed by the permit holder.

8. This permit shall be deemed invalid if it is lost or destroyed and no copy thereof shall be issued.

9. This permit may be withdrawn by an authorised person if the execution of any activity may be detrimental to the welfare of any wild animal or the safety of any person, provided that the permit holder is given notice of such intention and be granted the opportunity to appeal to such withdrawal.

10. The prescribed fee payable for the issuing of this permit shall not be refunded.

11. If the holder of this permit contravenes or fails to comply with any condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

12. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

13. The issuing authority shall determine the species and restricted activities for which this permit will apply.

14. If this permit applies to hunting, the holder of this permit must: a. Have a copy of this permit authorising the hunt, on his or her person during the hunt: b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating: i) the permit number and date of issuiance of the permit ii) the species, sex and number of animals hunted; and iii) the location where the hunt took place.

15. Return the original permit to the issuing authority forthwith after expiry of the permit.

16. This permit/certificate is subject to the provisions of any applicable law in force during the period of validity of the permit/certificate.

17. The holder of this permit may also allow the holder of a Special Game Licence to hunt the game shown herein during the Closed Season. However if this permit applies to a specimen listed in the Threatened or Protected Regulations the person hunting the animal must also be in possession of a permit issued by Ezemvelo KZN Wildlife to enable the hunting to take place.

18. The holder of this permit may also allow the holder of a relevant Game Licence to hunt the game shown herein. However if this permit applies to a specimen listed in the Threatened or Protected Regulations the person hunting the animal must also be in possession of a permit issued by Ezemvelo KZN Wildlife to enable the hunting to take place.

19. The attached return of the hunting permit must be completed by the holder. The completed permit to be returned to the Chief Executive, E KZN Wildlife, P O Box 13053 Cascades, 3202 or emailed to permits@kznwildlife.com upon expiry. Failure to comply with this condition may jeopardise the issue of future permits.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 12 September 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE

20. This permit is issued to the client named above and does not entitle the Professional Hunter and/or the Hunting Outfitter to hunt the species listed herein with another client, either on the property stipulated on the permit, or any other, should the hunt not be successful.

21. The area in which the lions are to be contained may not be less than 5 000 (five thousand) ha.

22. This permit/licence/certificate is issued subject to compliance with all other relevant legislation and does not preclude the permit holder from adherence thereto.

Please read the Terms and Conditions under which this Permit is Issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 12 September 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE PERMITS OFFICE
PO Box 13053, Cascades, 3202, Pietermaritzburg, KwaZulu-Natal
Tel +27 33 845 1320 / 1324. Fax: +27 33 845 1747. Fax to Email: 086 529 3320
Email: permits@kznwildlife.com. Website: www.kznwildlife.com

RETURN INDICATING THE DEGREE OF IMPLEMENTATION

Permit No: OP 3709/2018

To be returned by the permit holder immediately following the destruction of the game indicated herein.

If no animals were destroyed a "nil" return must be submitted.

Date	Species	Quantity	Sex	Licence Number.
12·10·2018	LION	1	M	209/2018

Copyright Reserved

04 June 2018

To whom it may concern,

Application for an import permit for a lion trophy to the United States of America

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Please feel free to contact me should you require any further information or Ezemvelo KZN Wildlife for verification.

JW Scribante (General Manager)

KWAZULU PRIVATE GAME RESERVE (PTY) LTD. – P.O. BOX 591 PONGOLA 3170
VAT NO: 4030205217 / COMPANY REGISTRATION NO: 2001/018212/07
TEL: 034 414 1085 / CELL: 083 845 5537 / FAX: 034 414 1389 / EMAIL: kwazulugame@gmail.com
DIRECTOR: JM QUELLHORST

EZEMVELO KZN WILDLIFE

Animal Scientist: Mammals and Birds

15 October 2019

Dear Stakeholder,

RE: KZN LION METAPOPULATION MANAGEMENT – RECOGNISED PROPERTY.

The management of lion populations within KwaZulu-Natal is guided by the nationally approved Biodiversity Management Plan (BMP) for the species. This BMP defines three types of lion populations, *viz:* Wild, Managed Wild and Captive, with populations within KwaZulu-Natal falling within the Managed Wild category (fenced reserves <1 000km^2/100 000ha).

In ensuring that the management of these populations is sustainable and contributes to the conservation efforts of the species, Ezemvelo KwaZulu-Natal Wildlife has implemented a metapopulation management approach for the province. KwaZulu Private Game Reserve (KPGR) is one of the properties whose population is considered to be Managed Wild. They have submitted a management return for the individuals on their property dating back to 2010, in which the *inter alia* births, deaths, offtakes and introductions are supplied. This data is utilised to ensure that populations are managed in accordance with the metapopulation principles adopted for KwaZulu-Natal. In ensuring that the metapopulation principles are maintained within the province, all permit applications for introductions are thoroughly scrutinised to ensure that no captive animals are brought into the province. This includes background checks into the properties from which any intended animals are applied for.

As a result of such, Ezemvelo KwaZulu-Natal Wildlife permitted the hunting of two adult male lions on KPGR during 2019. Based on the age of the individuals, these offtakes simulate the natural deaths of older males.

Please do not hesitate to contact me should you wish to discuss this matter further.

Yours faithfully,

Brent Coverdale

Mr Brent Coverdale - Animal Scientist: Mammals and Birds
Chair: Leopard Hunting Advisory Forum / Oribi Working Group
For CEO : EZEMVELO KZN WILDLIFE
033 845 1449 or 082 560 9769 or Brent.Coverdale@kznwildlife.com

CC: Wayne Munger

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Facchina	Robert	Aloysius	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
New Hope	PA	18938	Bucks	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
Same as Above

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ***... of Title 50***, and I certify that the information submitted in this application for a permit is complete and ... understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) [redacted]

Signature ... photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 14 Декабря 2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Robert A. Facchina, (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo - Lion

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

N/A

b. Date wildlife is to be hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Unit One, Matetsi Safari Area, Matetsi, Zimbabwe. Nearest "city" Victoria Falls. GPS coordinates 263.039

b. Date wildlife was hunted:

Hunt dates were October 26, 2018 thru November 12, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Outfitter MABALENGWE SAFARIS, Safari Company COLLECT AFRICA LTD, Professional Hunter CLIFTON WALKER LICENCE NO: 402

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Consultants International, 4 Josiah Chinamano Road, Belmont, Bulawayo, Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). See attached Hunting Permit issued by Zimbabwe National Parks and Wildlife Authority

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
City:	Belmont
State/Province:	Bulawayo
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Information not available to me.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Information not available to me

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Information not available to me.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than [redacted] alendar year.

    Applicant's signature: (b)(6) Date: 12-14-2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Att 24/10/18 1120

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081328
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Mabal'engwe Safari & Tours	Client's Full Name	Robert Facchina
ZTA (HOP) No.	HOP0251	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	5 Hoopoe Hollow Rd, Burnside, Byo	Address	(b) (6) New Hope, Pennsylvania, USA
Name of Professional Hunter	CLIFTON WALKER	Licence No.	402
Telephone		Fax	N/A
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Foreign Agent	TROMBERG HUNTING	Address	25 Mowen St Vineta Swakopmund NAMIBIA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Matetsi Safari Area - Unit 1	Matabeleland North	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	26-10-2018
Date of Safari To	12-11-2018
Daily Rate Charged For Big Game USD	800.00
Daily Rate Charged For Plains Game USD	400.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
ZPWMA
Date Stamp
1 OCT 2018
P BAG 5926
VICTORIA FALLS

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate

Less Commission

Other fees (Incidentals)

Percentage Commission Charged

Total Guests rate

Total Trophy fees

Grand Total USD

Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	GIRAFFE	M	K	UNIT 1	146056	26/10/18		
2	IMPALA BUCK	M	K	UNIT 1	142495	27/10/18	77,25	
3	ZEBRA	M	K	UNIT 1	TF7504	27/10/18		
4	LION	M	K	UNIT 1	263039	29/10/18	37,95	
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

I ROBERT FACCHINI hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client _____ Date 31-10-18

Signature of Professional Hunter _____ Date _____

Signature of Safari Operator _____ Date 31OCT18

TAX INVOICE № 34781

Zimbabwe Parks and Wildlife Management Authority
P.O. Box CY140, Causeway
Harare, Zimbabwe
Tel: 263-4-706077/8
Fax: 263-4-726089
E-mail:natparks@africaonline.co.zw
Website:www.zimparks.com

VAT REG:10018005

THE ACCOUNTS
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
01 NOV 2018
P. BAG 5926
VICTORIA FALLS

PAGE NO:

INVOICE NO:

DATE: 01/11/18

ORDER REF:

ACCOUNT NO:

CUSTOMER DETAILS

Mabalengwe Safaris
Unit One

INVOICE TO	DESCRIPTION	PRICE	QUANTITY	UNIT	AMOUNT	VAT	TOTAL AMOUNT
Robert	Giraffe (M)	850-00	01		850-00		850-00
Facchina	Waterbuck (M)	850-00	01		850-00		850-00
	Zebra	550-00	01		550-00		550-00
Trail 2	Lion (M)	5000-00	01		5000-00		5000-00
Number							
081328	Seven thousand two hundred and fifty dollars						
	Please net the amount shown as to be paid within fourteen days to be deposited in our Nostro FCA Account						
	NB: Nostro FCA (Domestic)						
	Acc Name - Parks & Wildlife						
	Bank - ZB Bank						
	Acc No - 4304-705420-406						
	Branch - Belmont Bulawayo						
				GRAND TOTAL	7250-00		7250-00

Signed by: Fiamke M Attwell (Manager) Received by

Date 01/11/18

Barry, Anna <anna_barry@fws.gov>

Robert Facchina PRT #22800D

1 message

Bar ov> Tue, May 28, 2019 at 1:25 PM
To: (b)(6)
Cc: "Brisendine, Amy" <amy_brisendine@fws.gov>

Dear Mr. Robert Facchina,

The following is in response to your phone call regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African lion. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African lion and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time. The application was assigned to Amy Brisendine of our office, if any additional information is needed for the application she will contact you directly.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

*WE HAVE PREVIOSLY SUBMITTED THIS DOCUMENT SEVERAL TIMES - IF YOU WOULD LIKE ANOTHER COPY PLEASE LET US KNOW.

Republic of Zimbabwe

Enhancement and Non-Detrimental Findings for

Panthera leo in Zimbabwe

Zimbabwe Parks and Wildlife Management Authority

October 2016

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed Lion Trophy from Zimbabwe.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservation

(b) (6)

ROBERT FACCHINA

5-27-2020

DATE

MABALENGWE

AFRICA SAFARIS

OPERATOR ENHANCEMENT QUESTIONNAIRE

Matetsi Unit One, Matetsi Safari Area, Zimbabwe

Prepared for US Fish and Wildlife Services

August, 2020

1. OPERATOR INFORMATION

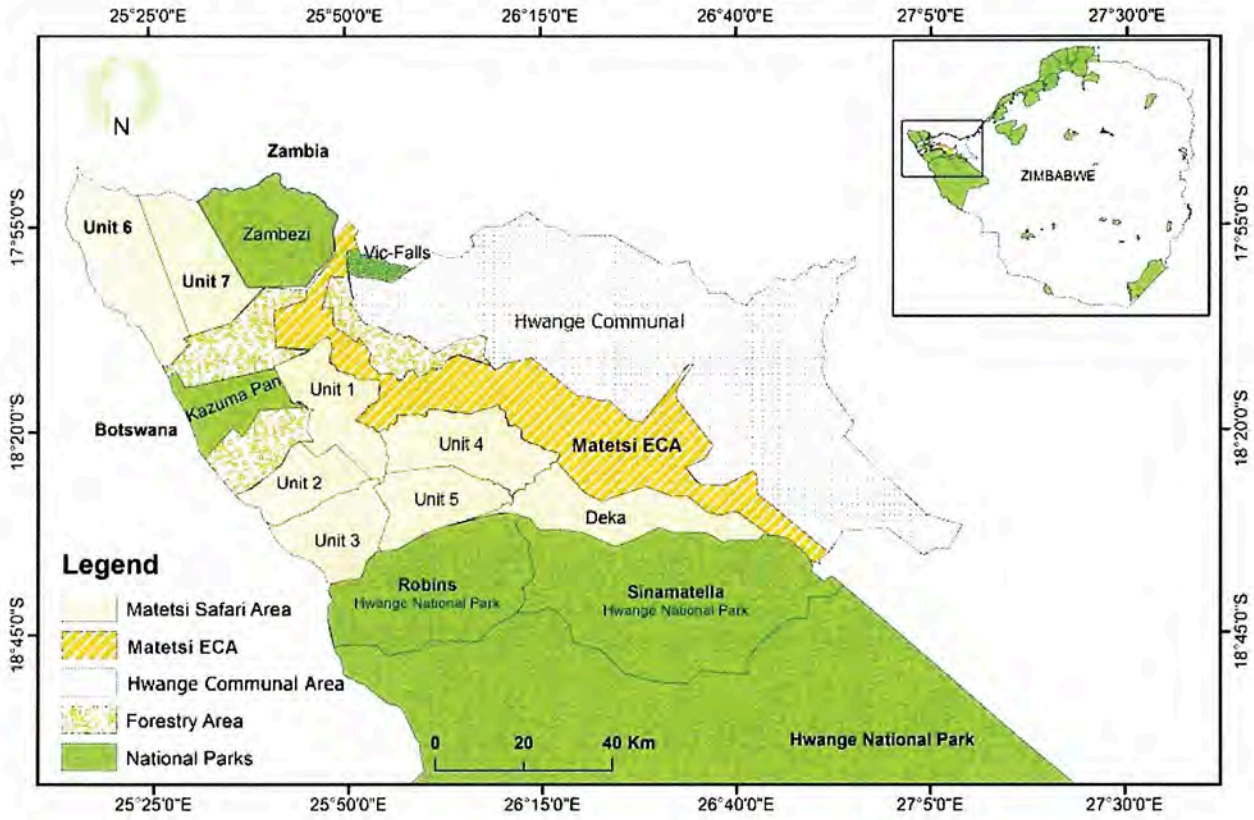
1.1. Name of Area	***MATETSI UNIT ONE, MATETSI SAFARI AREA***
1.2. Operator	***MABALENGWE SAFARIS (PVT) LTD***
1.3. Years in business?	***14 YEARS***
1.4. Name of company conducting hunt?	***MABALENGWE SAFARIS (PVT) LTD***
1.5. Country	***REPUBLIC OF ZIMBABWE***

2. CONCESSION

2.1. Name of Concession	***MATETSI UNIT ONE***
2.2. Area	***403.7 km²***
2.3. Land Tenure	***10 YEAR CONTRACT WITH ZIMBABWE PARKS & WILDLIFE AUTHORITY***
2.4. Renewable?	***YES, 5 YEARS***
2.5. Trophy fees received 2019	***US$ 418,237***
2.6. Concession location	

2.6.1. Map showing Matetsi Safari Area in relation to Victoria Falls Town

2.6.2. Matetsi Safari Area, Unit One boundaries in relation to Hwange National Park, Kazuma Pan National Park and Matetsi ECA



2.6.3. *MATETSI UNIT ONE*

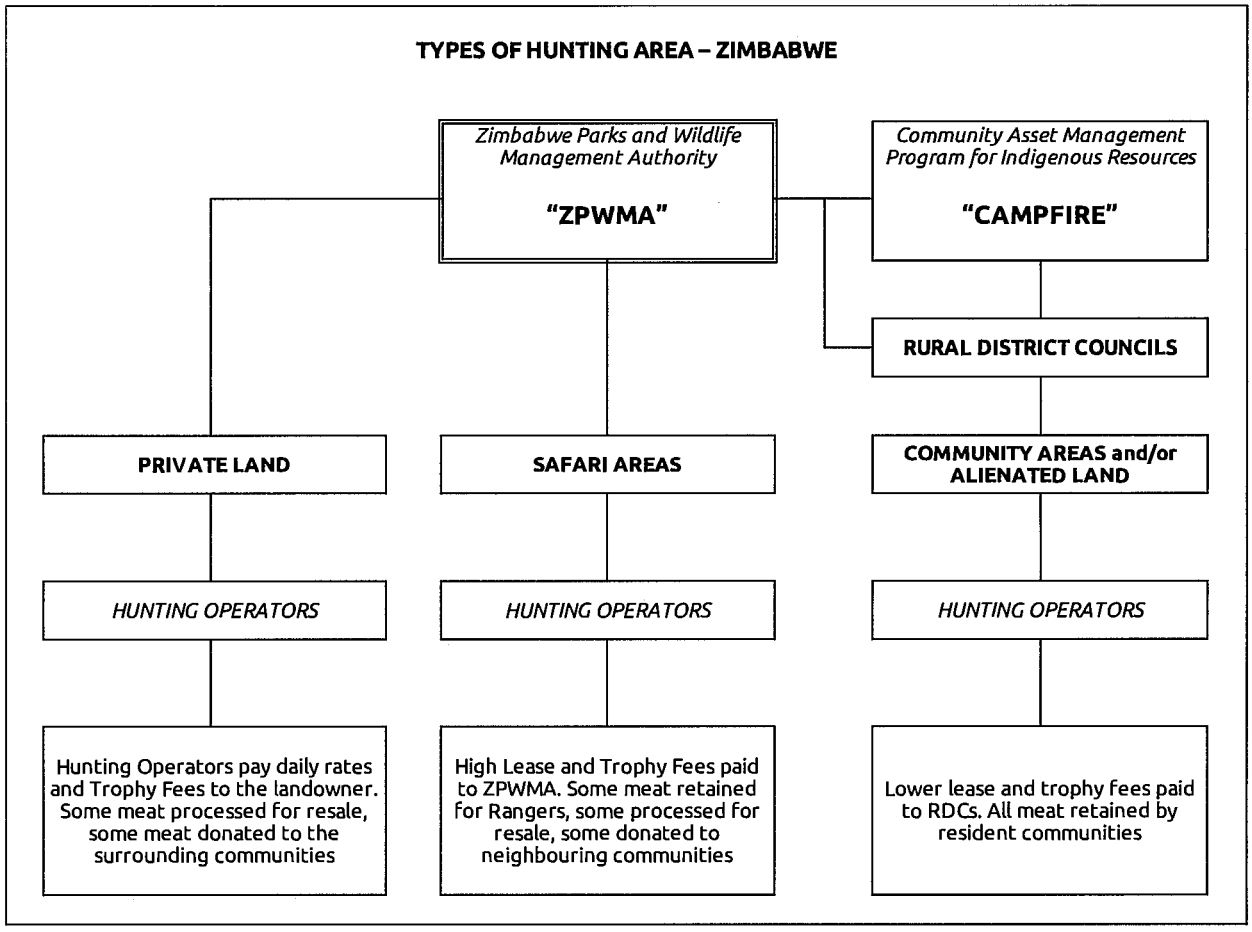
Unit One is a SAFARI AREA and located in the center of all the Units. The vegetation is dominated by mopane (Colophospermum mopane) woodland in association with vast stands of Lebombo ironwood (Androstachys johnsonii) and Combretum woodlands.

The geology is made up of mainly kalahari sands and basalt which form the base structure for the perennial rivers namely MATETSI, KACHACHETE, MANYATI and TSHABALISA RIVERS. Unit One also contains a number of fresh water springs that provide good groundwater all year round which makes it unique in the region.

The topography is varied from wide open savannah, dense riverine and teak forests and heavily grassed vleis.

2.6.1. *MATETSI SAFARI AREA IS DEFINED AS A "SAFARI AREA" IN TERMS OF SEC 35 OF THE ZIMBABWE PARKS AND WILDLIFE ACT (Chapter 20.14 (1996) as amended in 2001.*

Matetsi Safari Area is made up of seven Hunting Units bordering Hwange National park in the South, Kazuma Pan National Park in the West and Zambezi National Park in the North. It is also bordered by three Protected Forest Areas. The Matetsi "Environmental Conservation Area" makes up the most of the North Eastern boundary.



3. COMMUNITIES

As previously stated Matetsi Safari Area is classified as a Safari Area in terms of Sec 35 of the Parks and Wildlife Act, and human habitation and movement has been restricted since the promulgation of the Safari Area in the early 1970's. There are no communities living in the concession.

3.1. Community Areas - Environmental Conservation Areas ("ECA")

In early 2000 a number of privately owned game farms were sequestered by the State to form the Matetsi ECA. This area was resettled by small groups of villagers who took on the responsibility of managing the wildlife in these areas through the CAMPFIRE program (www.campfirezimbabwe.org). The ECA is administered through the District Council who have engaged a hunting operator who provides hunting services to the ECA. 55% of all proceeds from the hunting go to the communities living in the ECA as well as the meat from the animals hunted. Mabalengwe Safaris also provide these villagers with excess meat from time to time. At present there are 263 households. ALL hunting in the neighboring Community Areas is regulated by ZPWMA Matetsi Headquarters which is wholly funded by Safari Area Hunting Operators.

4. RELEVANT GAME POPULATIONS – MATETSI UNIT ONE

SPECIES	RELATIVE ABUNDANCE			ESTIMATED POPULATION	3-YEAR TREND			HOW MONITORED
	dense	average	sparse		up	down	stable	
Elephant	X			326	X			*Arial counts, camera trap survey, spoor counts, road strip counts, ranger sightings*
Lion		X		35	X			
Leopard		X		20			X	
Prey Species:								
- Impala	X			297	X			
- Buffalo	X			680	X			
- Zebra		X		183		X		
- Kudu	X			241	X			
- Chacma Baboon	X			315	X			
- Waterbuck		X		224		X		

5. LOCAL COMMUNITY PARTICIPATION

As mentioned previously Matetsi Unit One is a designated Safari Area and falls within the definitions of the Parks and Wildlife Act.

5.1. Employment

A total of fifteen seasonal contract workers are employed from the local surrounding areas with two admin staff employed year round. The hunting season normally extends from April through to November.

5.2. In May every year a further eight casual workers are employed from the surrounding areas to assist in the burning of protective fire-breaks within the area.

5.3. A total of six professional hunters are employed throughout the season on a contract hunt by hunt basis.

EMPLOYEE TYPE (MABALENGWE)	TOTAL #	Employed from local communities
Professional Hunters	6	
Trackers	2	2
Anti-Poaching Scouts/Rangers	6	6
Cooks/Houskeepers	3	3
Community Coordinator	1	
Manager	1	
Biologist	0	
Others	1	

5.4. During the off-season six full-time staff are employed except in April/May when a crew of nine casual workers are employed to implement our fire management plan with early burning of firebreaks

6. ANTI POACHING

6.1. As mentioned above Mabalengwe Safaris contributes **US$ 220,000.00 per annum** to Zimbabwe National Parks and Wildlife Authority who employ all of the anti-poaching staff as well as provide the ecology and biology services to each Matetsi Safari Area Unit and the surrounding Community Areas. A total of 32 wildlife rangers are employed on a full-time basis

EMPLOYEE TYPE (PARKS HQ)	TOTAL #	Employed from local communities
Professional Hunters	0	
Trackers	0	
Anti-Poaching Scouts/Rangers	32	32
Cooks/Houskeepers	0	
Community Coordinator	1	
Manager	1	
Biologist	1	
Others	0	

6.2. Anti-poaching is conducted year round

6.3. At any point in time at least two anti-poaching details comprising two armed Parks rangers and one armed policeman are in the field on deployment. This relates to 270 Extended Patrols and 30 local patrols with ad hoc strategic patrols per month

6.4. Mabalengwe have one dedicated anti-poaching vehicle which is utilised for anti-poaching patrols over and above the one vehicle employed by Parks for the same purpose.

6.5. The coordination of the anti-poaching patrols and any reactions are coordinated between the Senior Ranger at Parks HQ and the Mabalengwe General Manager.

6.6. Upon any arrests being made the Police personnel within each anti-poaching unit prepare all the necessary statements, complaint forms, crime reports, etc and the accused is then handed over to the Police in Victoria Falls for prosecution. We then engage an independent organisation namely SPEAK OUT FOR ANIMALS ("SOFA") www.speakoutforanimals.org to monitor any court proceedings and are engaged in the training and awareness of public prosecutors and the judiciary in wildlife crime prosecution.

6.7. Informal Anti-poaching units

Mabalengwe partly fund the employment of three youth volunteer anti-poaching units on our eastern boundary in the ECA. These units operate under the local District Council and are trained by Parks and Forestry Commission personnel. A total of 18 community scouts are employed under this program. We reward any of the community scouts for poaching related information and upon obtaining any arrests. In 2019 they were responsible for a total of six poacher arrests in the surrounding areas.

6.8. Anti-poaching results

TYPE	2017	2018	2019	REMARKS
Poaching incidents discovered	*7*	*8*	*9*	*Commercial Bushmeat*
Bushmeat recovered	*116kg*	*NIL*	*12kg*	*Dried biltong/jerky*
Elephant carcasses discovered	*NIL*	*NIL*	*NIL*	
Lion carcasses discovered			*1*	*Probable natural causes*
Leopard carcasses discovered	*NIL*	*NIL*	*NIL*	
Ivory poachers discovered	*NIL*	*NIL*	*NIL*	
Illegal logging observed	*NIL*	*NIL*	*NIL*	
Other poachers observed	*3*	*6*	*4*	*Fish poaching and netting*
Poachers convicted	*4*	*6*	*7*	*Bushmeat poaching*
Snares/Traps collected	*97*	*78*	*65*	*Wire snares*
Firearms confiscated	*NIL*	*NIL*	*NIL*	
Vehicles/Bicycles/boats confiscated				
Tusks recovered			*3*	*From carcasses natural causes*
Dogs exterminated	*NIL*	*3*	*6*	*Poacher hunting dogs*

7. COMMUNITY INVESTMENT

As previously stated, a number of unproductive farming and ranching areas were designated as "Safari Areas" as per the Parks and Wildlife Act more than 50 years ago creating wildlife areas used exclusively for hunting. The areas were also unsuitable for photographic safaris due to their rugged terrain and poor infrastructure. The purpose of these Safari Areas was to generate income for ZPWMA to make up the lack of funding from the non-hunting National Parks and to contribute to the administration and management costs of these vast areas. The areas are uninhabited and access is tightly controlled and the wildlife management is done as a joint effort between Parks and the Operator.

In our case the burden of social responsibility rests with ZPWMA who created the Environmental Conservation Areas which were developed so that Communities receive direct benefits from hunting.

Over and above this, Mabalengwe Safaris do however invest in other community based self-help projects through which we assist in the establishment of Income Generating projects. Examples of these are;

Hwange Baobab Processing Center

Matetsi Rural Tannery

Mabalengwe Meat Processing Project

This model is used successfully around most of Zimbabwe's main National Parks ie Hwange, Gonarezhou, Matusadona, etc.

Mabalengwe Safaris has contributed a total of US$654,892 to ZPWMA over the last three years in Right to Hunt Fees, Concession Fees and Trophy Fees.

8. COMPANY CLIENTELE

	Elephant			Lion			All Species		
	2017	2018	2019	2017	2018	2019	2017	2018	2019
Number of US clients	2	2	NIL	1	1	NIL	6	16	10
Percentage of US clients	50%	50%	NIL	50%	50%	NIL	33%	70%	43%
Income derived from US clients	$53,284	$48,176	NIL	$94,250	$85,123	NIL	$243,534	$422,777	$192,424
% of Total Income	22%	11%	NIL	29%	20%	NIL	67%	76%	45%

8.1. The company had 36 US clients over the last 3 years

8.2. Pertinent facts;

- The total income of the company is decreasing due to the lack of Lion and Elephant hunt sales

- The Number of US clients hunting Lion and Elephant is decreasing

- The US contribution to total income has dropped as a percentage

HUNTING PERMIT AND QUOTA

CITES Form 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box. (See paragraph 18 on reverse)

PCA: .....
PCA 200
Amount paid $250
Date 05/03/19
Rec. H10R079639

(payment details)

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

HUNTING PERMIT

PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*].

to ..... Mabalengwe Safaris .....

of ..... Matetsi Unit 1 .....

and co-hunter .....

.....

Firstly to hunt in Hunt Number or Section ..... Matetsi Unit 1 ..... of the ..... Mat North .....

..... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between ..... 01-01-19 .....

and ..... 30-11-19 .....

Animal	A	B	Animal	A	B	Animal	A	B
Baboon		20	Francolin		150	Leopard (m)		3
Buffalo (m)		21	Genet		5	Pegeons / Doves		150
Bushbuck (m)		5	Giraffe (m)		3	Porcupine		5
Bushpig		2	Grysbok (m)		4	Reedbuck (m)		10
Civet		5	Guinea Fowl		150	S. Hyena		30
Crocodile		2	Impala (m)		40	Sable (m)		8
Duiker (m)		6	Jackal		4	Sandgrouse		50
Eland (m)		5	Klipspringer (m)		3	Serval		1
Elephant (m)		5	Kudu (m)		20	Warthog (m)		10
Elephant T/L		2	Lion (m)		2	Waterbuck (m)		7
Wildcat		2	Zebra		15	XXXXXXXXXXXXXXXXXXXX		

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issue the permit

..... for and on behalf of the Director General. *Parks and Wild Life Management Authority*

(*Designation* .....)

..... for *Finance Manager*

..... for and on behalf of the Director General. *Parks and Wild Life Management Authority*

(*Designation* .....)

9. HUNTING POLICIES

9.1. All Professional Hunters employed by the company must be licensed with Zimbabwe Parks and Wildlife Management Authority (ZPWMA) having undergone a four-year apprenticeship under a licenced PH and then having passed written, oral and practical examinations. All of the PHs employed by the company have at least 10 years post apprenticeship experience.

9.2. Hunting may only take place in the presence of a licenced PH

9.3. Each hunt is issued a specific quota and must be pre-registered with ZPWMA and a ZPWMA ranger accompanies each hunt and records all trophies taken and their location

9.4. Hunting only takes place within daylight hours

9.5. No animals may be shot from a vehicle and must be hunted on foot

9.6. Sex and trophy requirements for hunted animals

- Old non-breeding male individuals are taken off as trophy animals
- No female lions are hunted or taken as trophy animals

9.7. ***Methodology for Lions and leopards age/sex requirements***

9.7.1. Photographs of a hunted trophy animal are taken from different angles of the animal body for later age and trophy quality determination (See attached Leopard and Lion Hunt Return Form)

POINTS SYSTEM FOR ADAPTIVELY MANAGING LION QUOTAS IN ZIMBABWE

9.7.2. The points system used to adaptively manage lion quotas has been developed following similar systems that have been implemented in countries such as Tanzania and northern Mozambique. The lion quotas are set per the age of the lions harvested during the previous hunting season. This adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted Non-Detrimental and Enhancement Finding: Conservation and Management of Lion by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organization. The approach adopted by Zimbabwe re cognizes four as opposed to three key age categories as shown in the example below:

	≥6 years	No trophy	5 years' old	4 years' old	<4 years	Failure to submit hunt return/incomplete hunt returns
For quotas of 3/more	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Quota setting process	These points are added up and divided by 3 to yield the quota for next year					

9.7.3. Lions are aged by triangulating multiple different aging characteristics, including:

- The degree of facial scarring;
- The teeth colour and degree of wear;
- The mane development (particularly regarding the shape around the ear and the mohawk);
- Through post mortem analysis of the width of the pulp cavity of the second premolar (which becomes narrower with age).

10. HUNT RETURNS AND REGULATION

10.1. Each Outfitter is issued a QUOTA by ZPWMA at the beginning of each year which has been determined by ZPWMA Ecologists and then presented at a public Quota Setting meeting held before the commencement of each season.

10.2. The Central Bank and ZPWMA operate an online platform namely Tourism Receipts Accounting System ("TRAS") which links all outfitters and ZPWMA to a central accounting system in which each hunt is captured prior to the commencement. The information is captured on a form (Annexure XX) which is then processed by the ZPWMA authority Area Office who authorises each hunt by way of a stamp once it has confirmed that there is available quota, etc.

10.3. A ZPWMA Ranger accompanies each hunt.

10.4. Upon completion of each hunt the "Details of Species Hunted" portion of the TRAS form is completed by the Ranger and submitted back to the ZPWMA Area Office for deduction from the quota.

10.5. Every TRAS form is signed by the Operator, the PH conducting the hunt and the hunting client on the completion of each hunt.

10.6. There are heavy fines and penalties for any operator who exceeds his quota

TRAS2 FORMS

24/10/18 1120

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081328
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Mabal'engwe Safari & Tours	**Client's Full Name**	Robert Facchina
ZTA (HOP) No.	HOP0251	**Passport Number**	488775162
		Country of Issue	UNITED STATES
Address	5 Hoopoe Hollow Rd, Bumside, Byo	**Address**	36 West Mechanic Street, New Hope, Pennsylvania, USA
Name of Professional Hunter	CLIFTON WALKER	**Licence No.**	402
Telephone		**Fax**	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Foreign Agent	TROMBERG HUNTING	Address	25 Mowen St Vineta Swakopmund NAMIBIA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Matetsi Safari Area - Unit 1	Matabeleland North	
2			
3			
4			
5			
6			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	26-10-2018
Date of Safari To	12-11-2018
Daily Rate Charged For Big Game USD	800.00
Daily Rate Charged For Plains Game USD	400.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
ZPWMA
Date Stamp
1 OCT 2018
P. BAG 5926
VICTORIA FALLS

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate

Less Commission

Other fees (Incidentals)

Percentage Commission Charged

Total Guests rate

Total Trophy fees

Grand Total USD

Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	GIRAFFE	M	K	UNIT 1	1660572	26/10/18		
2	WATERBUCK	M	K	UNIT 1	1622495	27/10/18	77,25	
3	ZEBRA	M	K	UNIT 1	1775204	27/10/18		
4	LION	M	K	UNIT 1	2650351	27/10/18	27,95	
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
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27								
28								
29								
30								

11. OTHER INFORMATION

Hunting in Zimbabwe Matetsi Safari Area is strictly regulated and monitored in line with national hunting laws, regulations and ethics. All hunting activity are monitored to verify that quotas and sex/age restrictions of harvested animals are being met.

The legal and regulation framework applicable to the hunting, conservation and protection of all species includes:

Parks and Wildlife Act; Chapter 20:14 (1996) as amended in 2001.
Environmental Management Act; Chapter 20:27.
Statutory Instrument 362 of 1990: Parks and Wildlife (General) Regulations, 1990.
Statutory Instrument 76 of 1998: Import and Export of Wildlife Products.
Statutory Instrument 40 of 1994: Parks and Wildlife Act (General) Amendments.
Statutory Instrument 26 of 1998: Parks & Wildlife Act (General) Amendment.
Statutory Instrument 92 of 2009: Compensation Values for Wildlife.
Statutory Instrument 93 of 2009: Compensation Values for Trapping of Animals.
Trapping of Animals Control Act 20.16.
Forest Act; Chapter 19:05.

Further conservation strategies for individual and groups of similar species are available to guide conservation of species of conservation concern. These include the Lion Conservation strategy of 2006 and the National Elephant management Plan (2015-2020) which is reviewed every five years.

11.1. Maintenance of the concession

11.1.1. Law enforcement

Local, mobile (vehicle), extended and strategic patrols are conducted by ZPWMA rangers. The rangers use of Spatial Monitoring Reporting Tool (SMART) technology to collect and capture and produce reports on law enforcement activities which enhances effectiveness and coverage of all concession area. Ranger support in the form of vehicle for deployment enhances timeous response to incursions across the concession which significantly reduce illegal offtake by poachers.

11.1.2. The concession undertakes fire management activities to: manage fuel load, improve habitat heterogeneity, control parasites and stimulate forage production and suppress unplanned veld fires during the dry season. Fire breaks along concession boundaries are carried out by ZPWMA in conjunction with the concession. The concession has an annual target of 50km^2 of early block burning, minimum of 50km target of road grading and fire breaks.

11.1.3. Game water management is also a critical are of management given the high elephant numbers. Supplementary artificial game water is provided by means of solar and wind power during the dry season (applies to other units except unit 1). Matetsi is endowed with natural annual rivers and springs that provide water for wildlife. Care is taken to prevent the unplanned game water provisioning through guidance from Area Ecologist in order to maintain area integrity through limiting impact of high elephant densities during the drought months from surrounding protected area network (parks and forest estates). Veterinary matters such as

diseases outbreak are managed and monitored by the ZPWMA Area Veterinary Doctor in conjunction with private wildlife veterinary institutions.

11.2. Research

Research in fire and habitat management, animal's survey is done by Area Ecologist and external researchers. The ZPWMA office at Matetsi Safari Area is involved in measuring, monitoring and analyzing trophy quality and offtakes of all hunted animals. This is done to ensure that Safari hunting does not substantially alter natural selection or ecosystem processes. The limited quota, as further limited by age restrictions, ensures that hunting offtakes do not negatively affect natural processes. This age-based policy for lions (*Panthera leo*) and *Panthera pardus* (leopard) was adopted in part to mitigate any social or population impacts from limited safari hunting.

12. There is no "one size fits all" conservation model when determining an Operators commitment to conservation and communities. Some African Operators (especially within the South African high-fence models) are specifically involved with community upliftment as are our CAMPFIRE Operators. It is our position that our commitment is even greater in that we fund the Regulator who in turn administers Hunting and Conservation on the National level.

In our view the right scenario for Zimbabwe is where there is a mix of different models to attain true Sustainable Use Conservation which is the current National Conservation Policy and is being applied throughout the industry in Zimbabwe.

13. It is our humble submission that we more than fit the criteria in terms of ensuring that our hunting is ethical, properly regulated, sustainable and benefits the overall Citizens of Zimbabwe in the case of any foreign sport-hunters that require a permit to import their trophies.

I hereby declare the foregoing to be true and correct to the best of my knowledge and ability

Signed in Matetsi on the 26th day of August, 2020

_____

CORNELIUS ABRAM SMIT

General Manager, Matetsi Safaris and Tours (Pvt) Ltd

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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SHANE MAHONEY
RENEE SNIDER

August 25th, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: amy_brisendine@fws.gov

RE: PRT # 22800D, Applicant Robert Facchina for a Lion from Zimbabwe
Supplement to the Import Permit Application

Ms. Nelson:

This is a supplement to the existing application, PRT # 22800D, for Robert Facchina for his lion trophy from Zimbabwe.

Answers to Missing section of Application:

6b. Date the Wildlife was taken October 29, 2018

9a. Do you have any information regarding the population status or trend data on the species hunted?

Please reference the Enhancement and Non-Detriment Findings for Panthera Leo in Zimbabwe (2016). In the Summary beginning on page 422, you will find Hunting in Zimbabwe has created financial incentives for the development and retention of wildlife across Safari Areas, Forestry Areas, Communal CAMPFIRE Areas, and private Conservancies. The lion population is well-managed due to strict quotas for offtake, with strict penalizations for non-compliance. Lion hunting is observed heavily by the ZPWMA with specific databases and return forms, like the TRAS2, where the hunting can be tracked and monitored throughout the country electronically. For Zimbabwe and the Matetsi Safari Areas the lion population is steady and growing.

9b. In-order-to hunt, you likely paid for licenses or trophy fees. What were those fees, and do you have any information on how those funds were used by either the landowner, local community, or government?

Trophy fees for a lion in this area are about $40,000 U.S. dollars. Mabalengwe Safaris has contributed a total of $654,892 U.S. Dollars to ZPWMA (Zimbabwe Parks and Wildlife Management Authority) over the last three years in Right to Hunt fees, Concession fees, and Trophy fees – all of that goes back into Conservation and anti-poaching done by ZPWMA. Non-hunting parks in Zimbabwe bring in very little money- it is Safari operators like Mabalengwe that bring in the capital for large scale conservation efforts.

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please reference the Operator Enhancement Report provided by Mabalengwe Africa Safaris. This report is extremely thorough and details the large amounts of money that the operator must pay to ZPWMA who employ all of the

anti-poaching staff as well as provide the ecology and biology services to each Matetsi Safari Area unit and the surrounding community areas. Per year -Mabalengwe spends $220,000 U.S. dollars on these efforts. In the report you will find that they have also stated that the total income of the company is decreasing due to the lack of lion and elephant hunt sales and the decreasing number of U.S. clients hunting lion and elephant. If import permits are not being issued for sport-hunted trophies than you can expect that a quarter million dollars will be lost every year on conservation in this area- and you can expect for the surrounding areas to follow.

Please refer to these documents and the hundreds of pages of information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by the government authorities in R.S.A., outfitters, and others, in making a positive enhancement finding and issuing an import permit for this lion trophy.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Robert Facchina w/attachments

Enclosures:
a. Operator Enhancement Report- Mabalengwe Africa Safaris
b. Enhancement and Non-Detriment findings for Panthera Leo in Zimbabwe (2016)
c. Notice of Representation

[EXTERNAL] Supplement to Permit # 22800D Robert Facchina - lion/ Zimbabwe

Aimee Korver <permits@conservationforce.org>

Thu 8/27/2020 11:12 AM

To: Brisendine, Amy <amy_brisendine@fws.gov>; s.facchina@johannafoods.com <s.facchina@johannafoods.com>; facchina@johannafoods.com <facchina@johannafoods.com>; abe@mabalengwe.net <abe@mabalengwe.net>; John Jackson, III <jjjiii@att.net>

4 attachments (7 MB)

#22800DRobertFacchinaNon.detrimentlion.pdf; #22800DRobertFacchinaOperatorEnhance.pdf; #22800DRobertFacchinaNoticeofRep.pdf; #22800DRobertFacchinaSupplementtoimportapplication.pdf;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. Brisendine,

Attached you will find supplemental answers and documents that we request be added to import permit application # 22800D for Robert Facchina.

Please let me know if you have received this and if you have any questions.

Kindest regards,

Aimée *Korver*

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

FEB - 1 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HOMYACK	STEVEN	(NMN)	JR

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. (b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ROBESONIA	PA	19551	LEBANON	U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
(SAME)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signatu(b) (6)ped signatures) Date of signature (mm/dd/yyyy) 12/19/2018

...e to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

SAME AS PAGE1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

STEVEN HOMYACK JR

(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☒ ~~Yes~~ NO

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      PANTHERA LEO AFRICAN LION

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

      SOUTH AFRICA
      NA VORSTERSHOOP NORTH WEST PROVINCE
      DR. RUTH SEGOMOTSI MOMPATI DISTRICT
      VORSTERSHOOP PORTION 109

   b. Date wildlife is to be hunted:

      DELETE GIT NA 09/09/2017 BEGIN

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

      NA SOMERBY SAFARIS

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      SOUTH AFRICA
      VORSTESHOOP NORTH WEST PROVINCE
      DR RUTH SEGOMOTSI MOMPATI DISTRICT
      VORSTERHOOP PORTION 109

   b. Date wildlife was hunted:

      11/09/2017 BEGIN

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

SOMERBY SAFARIS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

UNIVERSAL TROPHY SERVICES
PLOT 114
BASHEWA, PRETORIA
0056
SOUTH AFRICA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). COPIES ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: RUPERT PEDEKIND
Business Name: UNIVERSAL TROPHY SERVICES
Address: PLOT 114 BASHEWA
City: PRETORIA
State/Province:
Country, Postal Code: SOUTH AFRICA, 0056

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

ROBYN/SMALDEEL, THEUISSEN, VRYSTAAT, 9410

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

ANSWER ON ATTACHED PAGE.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

PLEASE FIND ATTACHED LETTER FROM THE HUNTING ORGANIZATION AS "SHPA LETTER".

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to re[redacted]g to import an elephant trophy, I understand that I may import no r[redacted] year.

    Applicant's si[redacted] Date: 12/19/2018

    Be aware that there r[redacted]nents by your local or state governments, as well as required by ot[redacted] conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

NO: 54047

Professional Hunters' Association of South Afri

Duration of Hunt: Commenced 12 / 07 / 2017 Terminated 12 / 09 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: S.J. van Rensburg

Business Address: Farm Monteloop

Rebus 81

Code: 5615

ID No: 5301175044087

PH Permit No: 076/10/2016 NW

Date: 12/09/2017 Signature:

CLIENT

Name: Steven [redacted]

Permanent Postal Address: [redacted]

Code: PA 19551

Country: [redacted] Tel/Fax:

Passport No: [redacted]

Email:

Date: 12/09/2017 Signature:

HUNTING OUTFITTER

Name: L.J. van Rensburg

Business Address: Farm Monteloop

Rebus 81 Code: 5615

ID No: 5301175044087

Tel No: 083 360 2234 Fax No:

HO Permit No: 035/10/2016 NW

Date: 12/09/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
B180/55122150591056	RSM	W.J. Botha Farm Monteloop Rebus 81 5615	12313	11/09	Lion	1		✓	Full mount
				11/07	Kudu	1		✓	Cape, Horns, Rectum

QUESTION

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies. Client Original White

1st Copy Pink Forward to Nature Conservation Authority where hunt took place

Hunting Outfitter 2nd Copy Blue Retain for a period of three years

Taxidermist 3rd Copy Green Taxidermist

Professional Hunter Last Copy Yellow Remains in book

NB: Voluntary conservation contributions for ev taken would be appreciated. These funds g wildlife conservation, the upliftment of con research projects and m

QUESTION 7

The DEDECT
Department:
Economic Development, Environment, Conservation and Tourism
North West Provincial Government
Republic of South Africa

OK Building
Market Street
P.O Box 112,
Vryburg, 8600

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT AND CONSERVATION

Tel: (053) 927 1809
Fax: (053) 927 2904
ehorn@nwpg.gov.za

STATEMENT BY THE HUNTER, PROFESSIONAL HUNTER AND LANDOWNER

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: 012313

Name of Hunter, Home address, Tel Number and Passport / ID number

Steven Homyeck: pp (b) (6)

(b) (6)
Robesionia
PA 19551
USA

Outfitter: Name & North West permit number

GG van Schalkwyk

Prof Hunters: Name & North West permit number of the two (2) PH's conducting the hunt

GG van Schalkwyk

T-J. Prinsloo

Description of animal Sex, Age, Origin (Docs e.g. Transport, Keeping & Import) and exact date and time released

1 x male lion

Release : 07/09/2017

Vorstershoop farm, Camp B

QUESTION 7

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES

DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

Ordinary Permit No: O 12313

Please familiarise yourself with this terms and conditions.
The permit is not transferable.
This permit shall be subject to the provisions of any law in force during the period of validity of the permit.
The Hunter or Landowner who contravenes or fails to comply with any one of the conditions or requirements, to which this permit is subject, shall be guilty of an offence.
This permit only authorises **the hunting** of the animal during the day.
The Hunter will ensure that this permit is immediately available during the hunt.
The lion must be released in the hunting area a minimum of 96 hours prior to hunt and after receiving a permit to do so.
Information requested on this permit shall be done in ink and in print. False and unreadable information will cause this permit to be invalid.
No person shall hunt the wild animal or may be allowed by a landowner to hunt if the hunter did not beforehand acquire the necessary hunting skills and firearm training to: i) Ensure the safety of him or herself, other people and non targeted species. ii) Ensure a hunt which consists of generally accepted sound hunting ethics, a fair chase, the minimum cruelty and damage to the ecology of the hunting area.
No person may hunt when under the influence of alcohol or any substance that may deter his/her vision, judgement or in any way negatively affect his or her conduct.
A Hunter will immediately report the wounding of any wild animal to the landowner or his representative and will be responsible for the tracking down and killing thereof. If there is reasonable chance that the animal pose any threat to property or human life, the hunter and the land owner will immediately notify both the nearest Police station and the Local Nature Conservation district officer.
The landowner may at any time stop the hunt and withdraw the permit.
A Hunter should be accompanied by a designated official from this Directorate.
Animals may not be hunted under the influence of drugs.
Only animals that have been declared as wild by this directorate may be hunted. (No tame animals may be hunted)

QUESTION 7

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

ORDINARY PERMIT: O 12313

(ORDINARY TROPHY OR PARTS TRANSPORT PERMIT CONDITIONS)

This permit authorises the transport of the Trophy or parts of the animal of the hunted animal from the venue of hunting to the approved venues of activity as specified on the permit.
This permit does not authorize the **selling, possession, exporting, importing** of the **Trophy** or part/s specified on the permit.
This permit is not transferrable.

PLEASE OBSERVE PERMIT CONDITIONS AT ALL TIMES

Ms. A V Talakasi
Permit Officer
Biodiversity Management
Dr. Ruth Segomotsi Mompati District
North West Province

Department of Rural, Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2017 -09- 05
Private Bag x 34, Vryburg 8600
NORTH WEST PROVINCE

QUESTION 7

No hunting with dogs is allowed.
Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. **A Nature Conservation Official must be present during the release and hunting of the lion.** **Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity.** **Tell: 053 928 0656 or \071 889 7867\082 446 1816**
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.

Signature of Issuing Officer: _____ Date: 05/09/2017

Signature of hunter: (b)(6) Date: 11/09/2017

Signature of land owner: _____ Date: 11/9/2017

Signature of PH: _____ Date: 11/9/2017

Department of Rural Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2017 -09- 05
Private Bag x 34, Vryburg 8600
NORTH WEST PROVINCE

QUESTION 7

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: O 12373

READ

NAME OF ISSUING AUTHORITY	
NAME	MINI CARONA OFFICES
ADDRESS	MOLOPO & NOORD STR
ADDRESS	VRYBURG
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	Steven	ID NO.	
SURNAME	Homyack	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS	(b) (6)	
ADDRESS	Lobeson's	SAME
ADDRESS		
TOWN	PA 19551	
POSTAL CODE		
PROVINCE	USA	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	WD Botha
NAME AND SURNAME : RESPONSIBLE PERSON	WD Botha
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Voorsteshoop Camp B
PHYSICAL ADDRESS OF FACILITY	Voorsteshoop
DISTRICT	Dr RSM
PROVINCE	North-West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	male	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 07/09/2017 at 07h00 and hunt from 11/09/17 at 07h00 Hunt one (01) Captive bred male lion of the farm Voorsteshoop Camp B. ~~Grid~~ NW.

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	S Homyack
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	GG Ian Schalkwyk
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	GG Ian Schalkwyk
WEAPON AND METHOD OF HUNTING	Rifle 416 Rigby. With 9 Steps

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	N/A
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 07/09/2017	TO:	06/10/2017
RECEIPT NUMBER	R 2400.00 CM		
SIGNATURE OF ISSUING OFFICER:	Department of Rural, Environment and Agricultural Development Dr Ruth Segomotsi Mompati District	SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	2017 -09- 05		

9.b.

The trophy fees for this is $12,500. A $1500 of that amount is for the permit and license fees.

Included in the $11,000 that is left, all expenses for instance, traveling to the Kalahari, paying the PH his daily fees, skinners, trackers, employees at the lodge, etc are all included in the $11,000. We pay a substantial membership fee annually to belong to the Professional hunters Association of South Africa (PHASA) and PHASA does a lot of community work.

We can't say from this specific lion-this is where we donated the money to. We use all the trophy fees for all animals hunted in general during the year to take care of families in need, help schools with learning materials, donating clothing to orphanages, etc.

The landowner must regularly, in his own capacity, get involved in community and socially uplifting work for instance donating to schools, etc. (please find attached a letter from a school where the outfitter donated.

Nature Conservation use the funds to pay the salaries of the workers that are working with the permit applications. Their job is to capture the applications and to issue the permits and to keep track of all the animals that have been hunted, the quotas still left, etc. The department of environmental affairs use some of the permit fees for conservation in national parks. –Somerby Safaris

Our group brought 6 large boxes of school supplies and donated them to a preschool. While in S.A. we also purchased 2 dozen pairs of shoes and a refrigerator that we also donated to the school.

-Steven Homyack Jr.

9.b.

Moreleta Park, 726 Biddy Street
moreletaparkpreschool@gmail.com
Natasha Botha 073 592 1560 /
Marga van Wyk 082 524 9193

13 August 2018

Dear Chris Botha (Kalahari Pride Safari)

On behalf of Moreleta Park Preschool, We want to extend a heart-felt thank you for your support and sponsorship to making this golf day so successful. The vibe was incredible and we are so grateful for everyone's contribution, fun attitude and encouragement!

Your generous contribution helped make our vision a reality by making it such a huge success. We will now be able to fix the damaged caused by the rain storm.

This was our first golf day, but definitely not our last. We are already busy planning our next golf day for 2019 and would love you to be part of it again. We will let you know early in 2019 what date we chose. Hope you will be part of it again and even see you there.

Sincerely,

Natasha Botha and Marga van Wyk
073 592 1560 / 082 524 9193
Moreletapark Preschool
Moreletaparkpreschool@gmail.com

9C

SAPA

Postnet suite 164
P Bag X 1288 Potchefstroom
2523

Tel 0836168104
sapaceo@sapredators.co.za

To : To whom it may concern
Re : Motivation of support to apply for export of lion trophy Dr Steve Hornyack

The application to export the trophy is supported by SAPA. The hunt was conducted on a SAPA accredited farm Vostershoop. This implies that the supplier of the animal and the presentation of the hunt was done in terms of the SAPA norms and standards as approved by the SAPA executive. The farm is submitted to a disciplinary process and regular audit.

The landowner also contributed a significant amount to the SAPA conservation fund. This indicate that money generated by the hunts also contributed to the conservation of the lion as a specie. The lion biodiversity management plan document serve as basis of all decisions made on the breeding and hunting of lion. SAPA is the author of this document and present it as proof of the commitment to conservation of the African lion.

The African lion is an iconic predator species. However, lion populations in most of Central and Northern Africa have become extinct and populations in Eastern and Southern Africa are under pressure. Serious and urgent efforts are required to reduce the threat to African lion populations in the wild.

The South African Predator Association (SAPA), on behalf of the captive lion industry in South Africa, recognizes that it has a special responsibility towards contributing to the survival and wellbeing of "wild" lion populations. To achieve this, SAPA has established a Conservation and Development Fund. The main aim of the Fund is to facilitate the lion industry's contribution to the conservation of wild African Lions and other predator populations.
The establishment of the Fund was approved by all SAPA members during the Annual General Meeting of Nov 2015 and confirmed by the SAPA Council meeting of 12th of July 2016.

The objectives of the Fund are:

1.1 to support approved lion/predator conservation projects;
1.2 to support approved lion/predator research projects;
1.3 to support approved projects to establish lions/predators in the wild;
1.4 to support approved social upliftment, development and educational projects in communities associated with lion/predator populations; and
1.5 to finance operational and administrative activities required by the above mentioned activities

Together with other members of this fund Mr Chris Both was instrumental to raise 1.2 Million rand for the conservation fund. This money is now at the disposal of the technical committee to evaluate appropriate projects to fund. He also donated funds to a pre-primary school of his choice.

Deon Swart
CEO SAPA
10.12.2018

SAPA

SOUTH AFRICAN
PREDATOR ASSOCIATION

Herewith SAPA certify

Chris Botha

As a member of good standing with full voting membership of SAPA
for the year 2018

13/3/2018

K. Nematendani
President
SA Predator Association

Form 3-200-20

FEB 21 2019

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS. IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
WILLIS	RONALD	CRAIG	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			cindi.rulon@procargousa.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
RAINBOW	TX	76077	SOMMERVELL	USA

2.a. Mailing address (include if different than physical address. Include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
HICO	TX	76457	HAMILTON	US

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Cindi Rulon atty in fact 02/19/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Pro Cargo-- attn: Cindi Rulon -- 15619 Morales Rd. Houston, Texas 77032-- FED EX envelope enclose

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   CINDI RULON CINDI.RULON@PROCARGOUSA.COM 281-220-3176

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO ---- LION

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Muchinga province, game management area- Munyamadzi- Hunting block- Nyampala Ranch, Mfuwe Town

b. Date wildlife was hunted:

JULY 28, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

BAOBAB SAFARIS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Bridge Shipping Zambia

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). -----attached-------

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Baobab Safaris
Address:	Plot No 133
City:	Freedom Way
State/Province:	Town Centre
Country, Postal Code:	Lusaka, Zambia

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

In one day of my lion hunt - I saw 5 male lion, 12 females and 3 cubs. I heard many lions every morning as they call to control the territory. This area has a large and well-managed lion population.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

I paid $10,000. for this lion hunt. These funds support the government efforts to manage the wild game with scouts, guides,anti-poaching efforts.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

The human interaction with the animal population is a problem - the funds from the hunting business go towards the government efforts to control this issue. The locals say that this problem has improved. The hunting industry benefits the community by providing income for the wildlife dept. as well the community.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: [signature] Atty in fact Date: 02/19/2019

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Original

NPW FORM 2

0000946

S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 12-07-2018

DETAILS OF LICENSEE

Full Name: RONALD CRAIG WILLIS NRC No./Passport No.....

Nationality..... Age.....

Tel/Mobile No:..... E-mail.....

Full Name of Safari Company: Baobab Safaris

Certificate of Incorporation No..... Date of Incorporation.....

Postal Address: 34252 LSK Residential Address.....

Firearm Licence/Tourist Firearm Import No..... Calibre of Firearm.....

Type of Hunt.....

Any other relevant information, which may be considered in support of this application (e.g. previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Nyampela Dec 0128	2018	

Total Animals fees paid - the kwacha equivalent of US$.....
Concession Fees paid - The Kwacha equivalent of US$ Nil
Grand Total the kwacha equivalent of US$.....

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
17 JUL 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA

Official Stamp

Chairperson of the Committee

*Note. Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

0000682

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue: Chilanga Date of Issue: 12/07/18

DETAILS OF PERMIT HOLDER

Full name: Ronald Craig Willis NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No.: ..... E-mail address: .....

Postal Address: Baobab Safaris Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 809 2. ..... 3. .....

Calibre(s) 1.: 300 2. 416 3. .....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No.: 0000898

Hunting Type: Non Resident

is hereby authorised to hunt in Mumyamadzi Game Management Area,

Nyampala Hunting block for ..... days from 18/07/18

to 06/08/18 (Dates inclusive)

Amount Paid: ..... GRZ Receipt No. 6049544

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
12 JUL 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE ON YOUR BEHALF.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6) [redacted]

Cell Phone

Email address: ~~Craigwillis@gmail.com~~ (b) (6) [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That, x Ronald Craig Willis (Full Name of Person), residing at x (b) (6) [redacted] Hico, TX 76457 hereby constitutes and appoints each of the following persons - John Rulon CHB

may act through any of its offices or any employees with Power of Attorney on file with this licensed broker as required by the Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed of said grantor from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, ontwear to any entry, withdrawal, declaration, certificate, bill of lading, or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandise; to receive any merchandize deliverable to said grantor: To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate, and delivery abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any customs district. To sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owners declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise: To sign and swear to any document, and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated said grantor. To authorize other Customs Brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantors name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor. And generally to transact at the customhouses in said district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930. In which said grantor is or may or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents; the forgoing power of attorney to remain in full force and effect until notice of revocation in writing is duly given to and received by the District Director of customs of the district aforesaid. If the donor of this power of attorney is a partnership, the said the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

Customs Rules on Discharge of Importers Liability for Duties

The U.S. Customs Service has issued a final amendment of the regulations to provide an alternative procedure for an importer record to pay duties on imported merchandise through a licensed customhouse broker. Present rules provide for the payment of duties to Customs by a broker on behalf of the importer. Under the alternative procedure, the importer may elect to submit to the broker a separate check or bank draft for the duties payable to the "U.S. Customs Service". The broker would then deliver the importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients, advising that if I the client is an importer of record, payment to the broker will not relieve the client of liability for Customs charges in the event that the charges are not paid by the broker. Brokers will be required to provide this notification to all active clients annually during the month of February. Additionally, brokers will be required to provide such information on a power of attorney executed on or after the effective date of the new rule. These amendments are effective as of September 27, 1982

IN WITNESS WHERE OF, the said (Print name) x Craig Willis

has caused these presents to be sealed and signed.

(Signature) x (b)(6) [redacted]

((Date) x 8-20-2018

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 29967D / lion import

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, May 22, 2019 at 5:00 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Ms. Vargas,

Africa writes their dates differently than the U.S. They put the day in the month first, then the month , then the year.

Zambia issued Craig Willis a hunting license 0000948 on July 12, 2018.

Then Craig Willis was issued a hunt permit 0000682 to hunt in the Munyamadzi Area on July 18, 2018 through August 6, 2018.

The lion was harvested on July 28, 2018 within the authorized hunt period.

I hope this information brings more clarity.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] : Application # 29967D / lion import

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, May 22, 2019 at 5:54 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Ms. Vargas,

I a ached page 4 from the lion applica on—it has the 9.a.b.c answered….. was this page missing?

Best Regards,
Cindi Rulon

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Houston, TX 77032

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From: Vargas, Darcy [mailto:darcy_vargas@fws.gov]
Sent: Wednesday, May 22, 2019 4:32 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Subject: Re: [EXTERNAL] RE: Applica on # 29967D / lion import

Dear Ms. Rulon,

Ref: 29967D

Thank you for the clarification on the hunt dates.

We will await your submission of an unaltered copy of license number 0000946 (without information *whited-out*).

Also, please let us know if we should wait for a response to application questions questions 9.a. through 9.c. or if you are choosing to leave your response to the ESA enhancement questions as "unknown."

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Wed, May 22, 2019 at 5:00 PM Cindi Rulon <Cindi.Rulon@procargousa.com> wrote:

> Dear Ms. Vargas,
>
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15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

From: Vargas, Darcy [mailto:darcy_vargas@fws.gov]
Sent: Wednesday, May 22, 2019 2:44 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Subject: Applica on # 29967D / lion import

Dear Ms. Rulon,

Ref: 29967D; Import of a lion trophy, from Munyanadzi province GMA, Lusaka Zambia, taken on July 28, 2018.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide a valid copy of the Zambia licenses/permits authorizing your lion hunt. Also, please be aware of the following:

- License # 0000682, issued to Mr. Willis, for hunting within Munyanadzi GMA, from June 8, 2018, through July 18, 2018, was enclosed in the application package. However, the approved hunt dates are prior to the date that the lion was hunted. Therefore the provided license does not indicate that the Munyanadzi GMA hunt was authorized by Zambia. Please provide a copy of a license authorizing Mr. Willis to hunt in Munyanadzi GMA on July 28, 2018.
- License # 0000946, that was issued on July 12, 2018, authoring Mr. Willis to hunt 1 lion in 2018, was also enclosed in the application package. However, this document was altered with *white-out* and the correlation between this license and the GMA hunting license is not completely clear. Please provide clarity on the 2 different licenses and different hunt authorization dates.

2. Please provide an unaltered copy of license number 0000946 (without information *whited-out*).

3. If available, please provide documentation to support the answers to application questions 9.a. through 9.c.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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Craig Willis lion permit - page 4.pdf
380K

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] : Application # 29967D / lion import

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, May 22, 2019 at 6:07 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Great--- I will contact Zambia for another copy of the hunt licence.

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 29967D / lion import

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 3:43 PM
To: cindi.rulon@procargousa.com

Dear Ms. Rulon,

Ref: 29967D; Import of a lion trophy, from Munyanadzi province GMA, Lusaka Zambia, taken on July 28, 2018.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide a valid copy of the Zambia licenses/permits authorizing your lion hunt. Also, please be aware of the following:

- License # 0000682, issued to Mr. Willis, for hunting within Munyanadzi GMA, from June 8, 2018, through July 18, 2018, was enclosed in the application package. However, the approved hunt dates are prior to the date that the lion was hunted. Therefore the provided license does not indicate that the Munyanadzi GMA hunt was authorized by Zambia. Please provide a copy of a license authorizing Mr. Willis to hunt in Munyanadzi GMA on July 28, 2018.
- License # 0000946, that was issued on July 12, 2018, authoring Mr. Willis to hunt 1 lion in 2018, was also enclosed in the application package. However, this document was altered with *white-out* and the correlation between this license and the GMA hunting license is not completely clear. Please provide clarity on the 2 different licenses and different hunt authorization dates.

2. Please provide an unaltered copy of license number 0000946 (without information *whited-out*).

3. If available, please provide documentation to support the answers to application questions 9.a. through 9.c.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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Vargas, Darcy <darcy_vargas@fws.gov>

Application # 29967D / lion import

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 5:31 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>

Dear Ms. Rulon,

Ref: 29967D

Thank you for the clarification on the hunt dates.

We will await your submission of an unaltered copy of license number 0000946 (without information *whited-out*).

Also, please let us know if we should wait for a response to application questions questions 9.a. through 9.c. or if you are choosing to leave your response to the ESA enhancement questions as "unknown."

[Quoted text hidden]
[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] : Application # 29967D / lion import

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 6:04 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>

Dear Ms. Rulon,

Ref: 29967D

I apologize! You are correct. I must have crossed this application with another one I am working on at the same time.

The only item pending completion of this application is an unaltered copy of license number 0000946 (without information *whited-out*).

Respectfully,

[Quoted text hidden]

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] : Application # 29967D / lion import

Cindi Rulon <Cindi.Rulon@procargousa.com> Thu, May 23, 2019 at 12:07 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Ms. Vargas,

Original Hunt permits are a ached for Ronald Craig Willis.

[Quoted text hidden]

Craig willis lion license- Zambia.pdf
2536K

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

0000682

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 12/07/18 .....

DETAILS OF PERMIT HOLDER

Full name:..... Ronald Craig Willis ..... NRC/Passport No:..... 505835426 .....

Tel/Mobile No.:..... E-mail address.....

Postal Address:..... Rookeb Safaris ..... Residential Address: ..... USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 809 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 300 ..... 2. ..... 416 ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0000898 .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Mwnyamadzi .....Game Management Area,

..... Nyampala .....Hunting block for .....days from..... 18/07/18

to..... 06/08/18 ..... (Dates inclusive)

Amount Paid..... $ 150- .....

GRZ Receipt No..... 6043544 .....

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
12 JUL 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

.....
Chairperson of the Committee

Note: *Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book*

Original

NPW FORM 2

0000946

S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue..... Chilanga ..... Date of Issue..... 12-07-2018

DETAILS OF LICENSEE

Full Name..... RONALD CRAIG WILLIS ..... NRC No./Passport No.....

Nationality..... Age.....

Tel/Mobile No:..... E-mail.....

Full Name of Safari Company:..... Baobab Safaris .....

Certificate of Incorporation No. ..... Date of Incorporation.....

Postal Address..... 34272 LSK ..... Residential Address.....

Firearm Licence/Tourist Firearm Import No..... Calibre of Firearm.....

Type of Hunt.....

Any other relevant information, which may be considered in support of this application (e.g, previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Nyampala	2018	4,200
			0000128		/

Total Animals fees paid - the kwacha equivalent of US$ 4,200

Concession Fees paid - the kwacha equivalent of US$ —

Grand Total the kwacha equivalent of US$ 4,200

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
12 JUL 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] : Application # 29967D / lion import

Cindi Rulon <Cindi.Rulon@procargousa.com> Fri, May 24, 2019 at 12:45 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Thank you for the update!

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] : Application # 29967D / lion import

Vargas, Darcy <darcy_vargas@fws.gov> Fri, May 24, 2019 at 12:41 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>

Dear Ms. Rulon,

Ref: 29967D

Thank you for the updated license. Your initial application review has been completed and your application has been forwarded to my supervisor for her review and decisions.

[Quoted text hidden]

[Quoted text hidden]

Application no. 29967D (specific date of hunt)

Brisendine, Amy <amy_brisendine@fws.gov>

Tue 4/7/2020 3:46 PM

To: cindi.rulon@procargousa.com <cindi.rulon@procargousa.com>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

Hi Ms. Rulon,

I apologize for the delay in processing this application to import a trophy of a lion that was hunted in Zambia (information below). Can you please provide me with the specific date the lion was hunted for the below applicant?

Applicant: WILLIS

Applicaon no: 29967D

Date received: 2/28/2019

Thank you and please contact me if have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 45 calendar days of the date of this email, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

[EXTERNAL] RE: Application no. 29967D (specific date of hunt)--- July 28, 2018

Cindi Rulon <Cindi.Rulon@procargousa.com>

Wed 4/8/2020 10:51 AM

To: Brisendine, Amy <amy_brisendine@fws.gov>

1 attachments (2 MB)

Craig Willis Lion hunt license- harvest record.pdf;

Hi Amy,

I a ached the Harvest Record for Craig Willis—lion hunt date shows July 28, 2018.

Please let me know if you need anything else.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

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From: Brisendine, Amy [mailto:amy_brisendine@fws.gov]
Sent: Tuesday, April 7, 2020 2:47 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>
Subject: Applica on no. 29967D (specific date of hunt)

Hi Ms. Rulon,

I apologize for the delay in processing this application to import a trophy of a lion that was hunted in Zambia (information below). Can you please provide me with the specific date the lion was hunted for the below applicant?

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Applicaon no: 29967D

Date received: 2/28/2019

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Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
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5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
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NPW FORM 12

0001805

ORIGINAL

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: AHMED PATEL NRC/Passport No. 579740/11/1

Residential Address: PLOT 396 A MAICENI RD LUSAKA

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: BAOBAB SAFARIS

DETAILS OF CLIENT

Name of client: RONALD CRAIG WILLIS NRC/Passport No: (b)(6)

Tel/Mobile No..... Nationality: AMERICAN

Postal Address..... Residential Address.....

Type of Licence: G.M.A PERMIT Licence No.: 0000682

Date of Issue: 12 JULY 18 Place of Issue CHILANGA.

Name of Hunting Block where hunting was conducted: NYAMPALA

Hunting period From 06-07-18 To 18-08-18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export		Foreign currency value charged to client
						Yes	No	
24-07-18	WATERBUCK	M	ONE	NIL	S12.65232	E3201310		0000972
26-07-18	BUSHBUCK	M	ONE	NIL	S12.65160	E3201012		0000976
27-07-18	ZEBRA	M	ONE	NIL	S12.64693	E3205807		0000974
28-07-18	LION	M	ONE	NIL	S12.62529	E3201947		0000946
29-07-18	CROCODILE	M	ONE	NIL	S12.61925	E3200264		0000948

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
WATERBUCK			26"	
BUSHBUCK			12½	
LION	2.85CM			
CROCODILE	13'6"			

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date..... Signature of Client.....

Date..... Signature of Professional Hunter.....

Date..... Name of Wildlife Police Officer KELLY NGULUBE

Employment No. of W.P.O. 273289

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Fw: [EXTERNAL] RE: Application no. 29967D - Ronald Craig Willis lion -- MORE DATA HERE

Brisendine, Amy <amy_brisendine@fws.gov>
Wed 5/6/2020 3:07 PM
To: Vargas, Darcy <darcy_vargas@fws.gov>

1 attachments (4 MB)
Ronald Craig Willis Lion permit- Op. Enhancement report-Zambia.pdf;

Hi Darcy,

Forwarding fyi.

Amy

From: Cindi Rulon <Cindi.Rulon@procargousa.com>
Sent: Wednesday, May 6, 2020 2:56 PM
To: Brisendine, Amy <amy_brisendine@fws.gov>
Subject: [EXTERNAL] RE: Applica on no. 29967D - Ronald Craig Willis lion -- MORE DATA HERE

Dear Amy,

I received an Operator Enhancement Report from Baobab Safaris in Zambia for Ronald Craig Willis. Can you add this data to his permit applica on ? MA29967d

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

From: Cindi Rulon
Sent: Wednesday, April 8, 2020 9:50 AM
To: 'Brisendine, Amy' <amy_brisendine@fws.gov>
Subject: RE: Applica on no. 29967D (specific date of hunt)--- July 28, 2018
Importance: High

Hi Amy,

I a ached the Harvest Record for Craig Willis—lion hunt date shows July 28, 2018.

Please let me know if you need anything else.

Best Regards,
Cindi Rulon

Pro Cargo USA
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Main Tel# 281.590.5500
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Houston, TX 77032

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From: Brisendine, Amy [mailto:amy_brisendine@fws.gov]
Sent: Tuesday, April 7, 2020 2:47 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>
Subject: Applica on no. 29967D (specific date of hunt)

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Applicant: WILLIS

Applicaon no: 29967D

Date received: 2/28/2019

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Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
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5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

Cindi Rulon

From: SPITS-II Production Email Messenger <permits@fws.gov>
Sent: Thursday, February 28, 2019 10:45 AM
To: Cindi Rulon
Cc: permits@fws.gov
Subject: Feb 28 2019 11:45:00; Acknowledgement letter for Permit No. "29967D""

RONALD CRAIG WILLIS
(b)(6) [redacted]
RAINBOW, TX 76077
U.S.A.

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/28/2019; check number 2927 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA29967D-0While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices. While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

MA-299670 - RONALD CRAIG WI

Operator Enhancement Questionnaire

Operator Information

a. Name of area operator: **Baobab Safaris Limited**

b. Years in business: **35 Years**

c. Name of company conducting hunt: **Baobab Safaris Limited**

d. Country: **Zambia**

Concession

a. Name of concession: **Nyampala Hunting block (Munyamadzi G.M.A)**

b. Area in km^2: **2185**

c. Land tenure: **Government and community lease**

d. Length of concession agreement: **7 Years**

e. Can it be renewed? **Yes**

f. Length of renewal, if applicable: **Unclear at this time**

g. Estimated total amount received in trophy fees last year, if applicable: **$250,000.00**

h. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

Over and above the obligatory concession fees paid to the Government and Local Community, Baobab Safaris Limited spends an additional $60,000.00 Annually for the below mentioned activities:

- **Infrastructure Development pledge annually**
- **Resource Monitoring pledge annually**
- **Community development pledge annually**
- **Law enforcement pledge annually**
- **Fire management pledge annually**
- **Annual Evaluation of compliance by hunting outfitter**

These funds where used for the following activities:

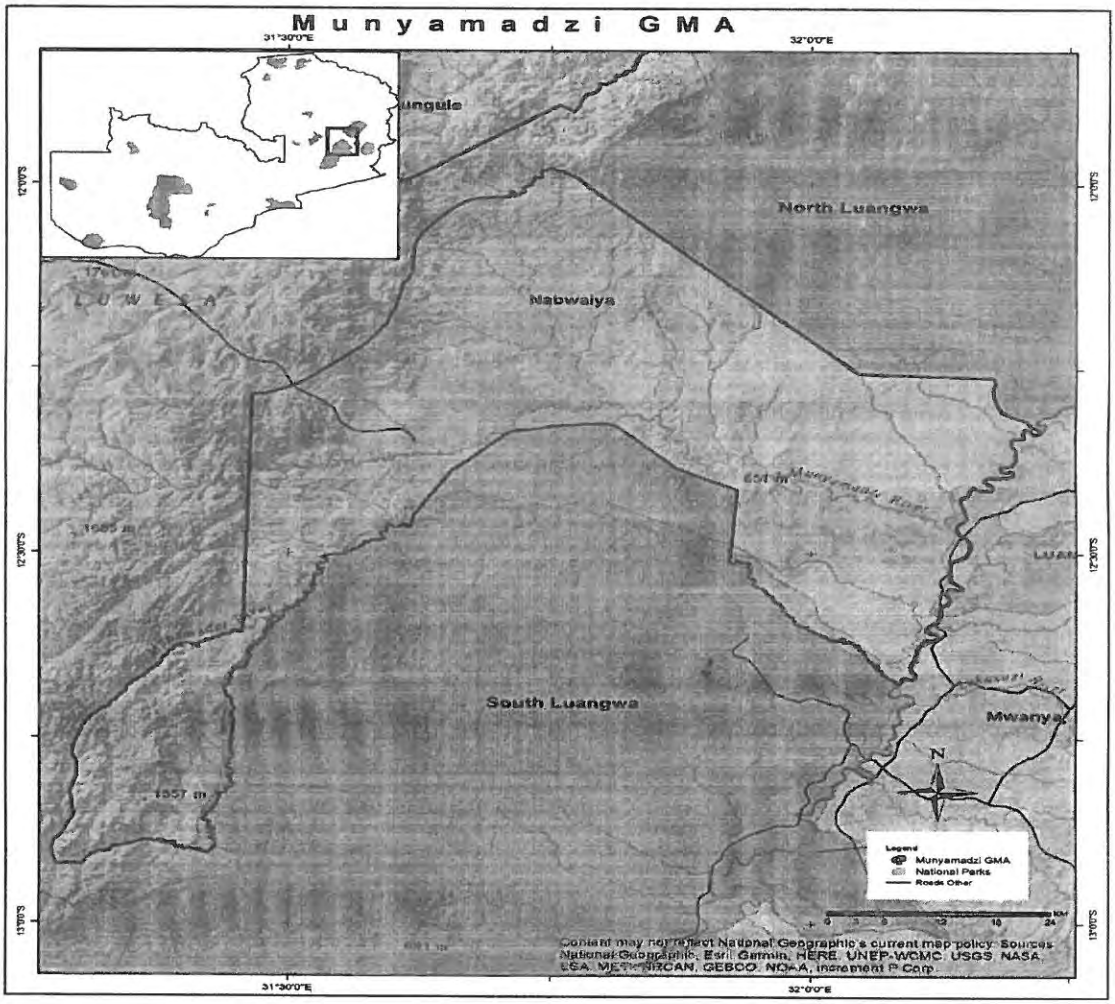
- **Purchase a new Land Cruiser pick up for community use as well as Anti Poaching use.**
- **Two students from the community are currently in college studying Tourism funded directly by the safaris outfitter.**
- **Community is directly paying bursaries for 19 students from these funds.**
- **The construction of 12 brand new Scout houses, 6 at Kalimba and 6 at Mayembe to assist with Law Enforcement in those areas.**

Operator Enhancement Questionnaire

- **Purchase of computer and printing equipment for Kanele wildlife headquarters in the area as while as Community resource board offices.**
- **Purchase of 4 shotguns for Anti poaching patrols.**
- **Funds were also used for delivery of 70% meat to all areas of the blocks.**
- **Repairing the NTUNTA-NABWALYA Road as access to the areas is completely restricted during the rainy season.**
- **Building and refurbishing of schools, clinics, teachers houses, mothers shelters, a guest house, repairing and drilling of new boreholes.**

i. Please provide the concession location and nearest City: **In Between Luambe, South Luangwa and North Luangwa National parks.**

J. Please attach a map or maps with the boundaries marked and showing the nearest city:



k. If the concession borders a national park, please provide the park name: **South Luangwa National Park, Luambe National Park and North Luangwa National Park.**

l. Description of general and distinctive habitat features and any water features:

The water features are: Luangwa River, Munyamadzi River, Mupamandzi River and Mutinondo River.

The Habitat features are: Mopani Woodland, Semi Savanna, Miombo Woodlands and Riverine Bush.

Communities in the Concession

a. Are there any communities living in the concession? **Yes**

b. If so, estimated number of people or villages in the concession? **14,220 under 105 Headmen and one chief.**

c. Are there communities bordering this concession? **Yes**

d. If so, estimated number of people or villages around the concession? **The bordering areas are also Game Management areas and they have their own conservation plans in place.**

Relevant game populations in the concession:

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How is it monitored?
Elephant	Dense	± 3,000	Up	-Regular aerial patrols by Frankfurt Zoological Society and daily sighting by operator. - Patrol records from scouts
Lion	Dense	± 85	Up	-Camera trap footage; -Shared information with Zambia Carnivore Project, conservation South Luangwa, Frankfurt Zoological Society. -Daily sightings -Data recorded on patrols.

Operator Enhancement Questionnaire

Prey species				
- Buffalo	Dense	± 2,500	Up	- Regular aerial patrols.
- Bushbuck	Dense	± 350	Up	- Data collected by scouts
- Bushpig	Average	± 200	Up	- Daily sightings by outfitter.
- Crocodile	Dense	± 1,000	Up	
- Duiker C	Average	± 100	Stable	
- Eland	Sparse	± 150	Stable	
- Grysbok	Average	± 80	Stable	
- Hartebeest	Sparse	± 80	Stable	
- Hippopotamus	Dense	± 5,000	Up	
- Hyena	Average	± 250	Up	
- Impala	Dense	± 8,000	Up	
- Klipspringer	Sparse	±50	Stable	
- Kudu	Average	± 250	Stable	
- Puku	Average	± 1,000	Up	
- Reedbuck	Sparse	± 50	Stable	
- Roan Antelope	Sparse	± 150	Stable	
- Warthog	Dense	± 1,000	Up	
- Waterbuck C	Average	± 250	Up	
- Wildebeest C	Dense	± 1,250	Up	
- Zebra	Dense	± 3,000	Up	

If there are any population studies or reports being done in or around the concession area, please provide a copy with your application.

Are there any actions being taken to conserve game community habitat? If so, please explain and attach any relevant project photos or reports.

Local Community Participation

a. Total employment number: **82**
b. Total employment in off-season: **37**
c. Please identify the number and type of all employees:

Employee Type	Number of Employees	Number of Employees from local communities	Number of Employees in the off Season
Professional Hunters	3	3 Zambian Citizens	
Trackers	6	6 locals	
Anti-poaching scouts/rangers	31	31 locals employed by Community Resource Board funded by hunting operations	
Other anti-poaching	6	Wildlife Offices under D.N.P.W	
Cooks/housekeepers	6	6 locals	
Community coordinators	3	3 community	
Managers	2	Not local	

Operator Enhancement Questionnaire

Biologists	2	Employed by the Department of National Parks and Wildlife	
Others: Road cleaning crews	15	15 locals	
Airstrip cleaning crews	15	15 locals	

Anti-poaching efforts

a. Number of anti-poaching staff: **63 community scouts Employed by Community Resource Board, supported by 2 hunting operators that operate the 2 hunting concessions within this Game management Area, also supported by Frankfurt Zoological Society and Department of National Parks and Wildlife.**

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **Both**

c. Months during which anti-poaching patrols are conducted: **All year round**

d. Number of anti-poaching patrols per month: **10 long patrols, 6 short patrols and 20 day patrols.**

e. Estimate the percentage of trophy fees that go toward anti-poaching efforts**: 50%**

f. Description of anti-poaching equipment, vehicles, etc.: **Spotter planes (FZS), Vehicles, Rifles, camping equipment, communication equipment, bicycles, uniforms, boots and rain coats.**

g. Do government-sponsored game scouts conduct patrols: **Yes**

h. if so, do they have the ability to arrest? **Yes**

i. Do you offer rewards to poaching informants leading to arrest? **Yes**

j. Do you offer rewards to poaching informants upon conviction? **Yes**

k. Please describe the operators anti-poaching expenditures for the past 3 years below.

Type of expense	Spending 2016	Spending 2017	Spending 2018	Remarks
Salaries for anti-poaching scouts	$18,600.00	$18,600.00	$18,600.00	
Equipment	$3,000.00	$3,000.00	$3,000.00	
Vehicles	$25,000.00	$25,000.00	$25,000.00	
Petrol	$4,000.00	$4,000.00	$4,000.00	
Rewards paid	$3,250.00	$3,750.00	$3,750.00	
Other: Fire management	$2,500.00	$2,500.00	$2,500.00	
Other: Infrastructure	$,10,000.00	$10,000.00	$10,000.00	
Community development	-	-	-	
Totals	**$66,350.00**	**$66,850.00**	**$66,850.00**	

Operator Enhancement Questionnaire

1. What currency are the expenditures given in? **US$**

Anti-poaching results

Category	2016	2017	2018	Remarks
Poaching incidents discovered	28	23	19	
Elephant carcasses observed	7	2	1	
Lion carcasses observed	2	-	-	
Leopard carcasses observed	-	1	-	
Ivory poachers Observed	1	-	1	
Bush Meat poachers observed	30	22	18	
Illegal Logging Observed				
Other poachers Observed	20	14	12	
Poachers convicted	29	27	22	
Snares/traps collected	60	24	19	
Firearms confiscated	20	14	11	
Vehicles confiscated	-	-	-	
Bicycles confiscated	12	6	2	
Boats/nets confiscated	15 nets	12 nets	10 nets	
Tusks recovered	5 pairs	2 Pairs	1 pair	
Other: _____				

Community investment

a. Does the company contribute money or goods/services to local communities? **Yes**

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?

- **As required by law and contract, 20% of concession fees goes directly to the community and 80% goes to the Department of National Parks and Wildlife.**
- **Over and above this, the company pays $60,000.00 to the community/Department of National Parks and Wildlife for infrastructure development for law enforcement, resource protection, fire management and community development.**
- **Trophy fees are shared between the government and local community on a 50/50 share basis. 50% of the money goes direct to the community for community projects annually.**
- **Voluntary donations are also provided such as solar powered street lights to wildlife camps for security purposes.**

c. Does the company provide game meat to nearby communities? **Yes**

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: **Over 70% of meat was delivered free of any charges totalling approximately 33,990 kgs calculated at $5 per kg equates to the value of $169,950.00**

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **This is mainly done in the off season when crops are in the fields by the Department of National Parks and Wildlife, community scouts using funds provide by the safaris outfitter.**

- **Chilli fences are erected**
- **Chilli bombs**
- **Chilli blocks are made**
- **Beehives are put around the crops.**
- **Fireworks are procured and distributed to all Village Area Groups (VAGs).**
- **PAC hunts are conducted if the outfitter is called upon to assist, but are usually done by D.N.P.W.**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **Maize is bought and given to the local residents so that they can survive through the difficult dry season.**

Species	Damage caused	Consolation paid 2016	Consolation paid 2017	Consolation paid 2018
Elephant	Maize	500 x 50kg bags of maize grain is provided for elephant damage as well as drought relief.	500 x 50kg bags of maize grain is provided for elephant damage as well as drought relief	500 x 50kg bags of maize grain is provided for elephant damage as well as drought relief
Lion	NIL	-	-	-
Leopard	Nil	-	-	-
Crocodile	6 people killed	2 people killed Funeral expenses paid	3 people killed Funeral expenses paid	1 person killed Funeral expenses paid
Hippo	1 person killed	-	-	-

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **Dollars**

h. Describe any community projects paid by the company:

Operator Enhancement Questionnaire

Type of project	Spending 2016	Spending 2017	Spending 2018	Remarks
Education (e.g., classrooms, offices)	1 school built	2 schools built	3 schools built	
Education (e.g., school fees, supplies)	Paying bursaries for 19 students in college and 2 in university	Paying bursaries for 19 students in college and 2 in university	Paying bursaries for 19 students in college and 2 in university	
Health (e.g., clinics, offices)	Providing fuel and maintenance for the ambulance	Providing fuel and maintenance for the ambulance	Providing fuel and maintenance for the ambulance	
Health (e.g., medical salaries, equipment)	- Construction of mothers shelter at local clinic - Purchase of medicines to the clinics when required	- Construction of mothers shelter at local clinic - Purchase of medicines to the clinics when required	- Construction of mothers shelter at local clinic - Purchase of medicines to the clinics when required	
Community scout salaries	$18,600.00	$18,600.00	$18,600.00	
Other community anti-poaching	Drama clubs funded and sensitisation of villagers to the benefits of conservation	Drama clubs funded and sensitisation of villagers to the benefits of conservation	Drama clubs funded and sensitisation of villagers to the benefits of conservation	
Local government activities	-Quarterly meetings held. - Access Road clearing. - Conservation farming training. -Dugout canoes procured for crossing rivers in wet season.	-Quarterly meetings held. - Access Road clearing - Conservation farming training. - Guest house Construction. -Dugout canoes procured for crossing rivers in wet season.	-Quarterly meetings held. - Access Road clearing - Conservation farming training. - Guest house Construction. -Dugout canoes procured for crossing rivers in wet season.	
Water infrastructure improvements	Drill 1 borehole at Chilima scout camp.	Drill 2 boreholes.	Drill 3 boreholes.	
Sports teams funded	Soccer clubs funded	Soccer clubs funded.	Soccer clubs funded.	

Operator Enhancement Questionnaire

Construction materials donated	**Cement, roofing sheets, paints and block making moulds provided.**	**Cement, roofing sheets, paints and block making moulds provided.**	**Cement, roofing sheets, paints and block making moulds provided.**	
Other: _____	**Subsistence allowance during court seasons**	**Subsistence allowance during court seasons**	**Subsistence allowance during court seasons**	
Other: _____	**Salaries paid for 25 community Teachers.**	**Salaries paid for 25 community Teachers.**	**Salaries paid for 25 community Teachers.**	
TOTALS				

i. What currency are the expenditures reported in: **Dollar**

j. Include receipts and photographs of projects, if available

Company Clientele

a. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	All species
Number of U.S. clients	**2016: 1** **2017: Nil** **2018: 4**	**2016: 1** **2017: 2** **2018: 2**	**2016: 5** **2017: 9** **2018: 11**
Percentage of U.S. clients	**2016: 100%** **2017: Nil** **2018: 100%**	**2016: 100%** **2017: 100%** **2018: 100%**	**2016: 45%** **2017: 85%** **2018: 95%**
Trophy fees paid by U.S. clients	**2016: $15,000.00** **2017: Nil** **2018: $60,000.00**	**2016: 15,000.00** **2017: $30,000.00** **2018: $30,000.00**	**2016: $67,500.00** **2017: $121,000.00** **2018: $142,000.00**

b. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

65% U.S Clients.

Hunting Policies

a. List the expertise required for the company's professional hunters (i.e. abilities and experience):

- **Professional hunters need to have people skills.**
- **Professional hunters need to have medical skills.**
- **Professional hunters need to have mechanical skills.**
- **Professional hunters need to have good knowledge of Fauna and Flora.**
- **Professional hunters must undergo a minimum of 3 years practical training in the hunting of dangerous game. They are encouraged to do their apprenticeships with as many fully licensed pro hunters as they can, they are also encouraged to do it in as**

many hunting blocks as they can, this is for them to get different ideas and broaden their knowledge in the selection and follow up dangerous game in different conditions.

b. Are there age/sex requirements for take of trophies? If so, please describe how this is enforced for each species (attach methodology if available): **Yes,**

- **The outfitter has also been following an age based off take approach since the re-introduction of Lion and Leopard trophy hunting in Zambia, the company has cited 7 years as the benchmark for the minimum age of cats to be harvested. The company also insists that the professional hunters be very conservative when estimating ages of cats to be hunted, as a result many cats are passed up before the correct speciment that meets the criteria is found.**
- **It is company policy to harvest mature males from different zones of the hunting block rather than from the same parts of the hunting areas.**
- **Lion ageing is based on a few factors:**
  - i. **Blackness of the nose needs to be 80% black or more to be of age.**
  - ii. **Facial scaring the more the lion is scared than its older.**
  - iii. **The slack jaw indicated an old lion.**
  - iv. **Professional hunters must look at the lion teeth if they are short and yellow that means the lion is old.**

c. Are there hunt return forms that must be reported to officials? If so, please include a copy of these forms or confirmation of their receipt for the past 3 years: **Yes, attached is the Lion and Leopard hunt return form and the Elephant ESI form.**

Other information

Please provide a narrative of other enhancement information about the operation, such as any additional hunting policies, maintenance of the concession, management activities, research, community involvement and outreach, etc.

- **Baobab Safaris Ltd has made it mandatory for all its professional hunters to take available online refresher training courses for aging predators to keep them abreast with international standards on aging Lions and Leopards.**
- **From 2015 to date, 10 boreholes have been serviced and drilled to provide clean drinking water.**
- **Construction is at the planning stages for another safari camp to be built in the area that is meant to be used for used for consumptive and non-consumptive tourism activities, as a means of Job Creation and Increased Revenue for all Stakeholders.**
- **Sensitising community members particularly at grass root level of the benefits of Safari hunting and conservation.**

Operator Enhancement Questionnaire

- Every year the community endeavours to select and train between 5 and 10 new wildlife scouts that are employed within the Munyamadzi Corridor and North Luangwa conservation project area that this G.M.A is part of.
- Land use plans and general management plans are currently being finalised for the G.M.A, this is to reduce habitant loss, to avoid silting of the rivers, to reduce human - animal conflicts.
- Zambia Carnivore programme and Frankfurt Zoological Society have got Lions, Wild dogs and Elephants collared that roam these areas and data sharing of sightings and pictures from camera traps as well as conventional cameras are shared by our professional hunters, this data sharing is proving to be useful to the success of these research projects.

I declare that the foregoing is true and correct.

Signature: (b)(6) _____

Name: RASHID NANDENA Title: (b)(6)

LEOPARD AND LION HUNT RETURN FORM

(Each animal hunted should be accompanied by a separate data sheet and all measurements should be in metric units)

Name of Professional Hunter:	Monitoring Scout:	Rank:

DETAILS OF CLIENT

Name of client:	Nationality:
Country of Residence	
Address:	
GMA permit No:	Non Resident Hunting Licence No:

DETAILS OF HUNT AND TROPHY MEASUREMENTS

Name of GMA:		Hunting period	
Name of Hunting Block:		From (Date):	To (Date):

Date Killed or wounded	Species	Killed or Wounded	Sex (Tick)		GPS Location (in decimal degrees - hddd.ddddd°)	
					Latitude	Longitude
			Female	Male		

Date measured (DD/MM/YY)	Total length (Nose to tip of tail - cm)	Tail length (cm)	Shoulder height (Shoulder to base of paw in cm)	Skull length (cm)	Skull width (cm)

PHOTOS & SAMPLES (tick in space provided for photos & samples taken)

1. Whole body from the side*		7. Teeth before cleaning (front & side)*		12. Ridges on back of Lower canines	
2. Mane from the top*		8. Teeth after cleaning (front & side)		13. Tissue samples taken	
3. Face & head from the top*		9. Lower Jaw from side		14. Premolar extracted	
4. Face & Chest*		10. Ridges on back of Upper Canines			
5. Nose*		11. Whisker spots (Right & Left)			

*These photos should be taken at kill site before skinning and in as good of light as possible. Teeth and nose should be blood and dirt free to provide clear assessment

DATA RECEIVED BY:	DATE:	SIGNATURE:

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(Act No 12 of 1996)

STATUTORY INSTRUMENT No 107 OF 2010

Form ESI

The Zambia wildlife (Elephant)(Sport Hunting) Regulations,2010

SECTION A: Licensing details

Station of issue .....Date of issue.....

Full Name .....NRC/Passport No.....

Postal Address.....

Residential Address.....

Non Resident Hunting License number.....

Details of firearm (S): Firearm License No(s).....

Calibre of firearm(s) .....

SECTION B: Hunting Details

Date of Hunt.....Name of Hunter.....

Hunting Block.....Animal Sex.....

	Tusk 1	Tusk2
Weight	.....	.....
Length	.....	.....
Special Mark(s)	.....	.....

SECTION C: conditions

1. This form shall be completed and submitted together with the ivory to the nearest Area Management Unit within 48hrs of the killing of the elephant.
2. The completed form shall move with the ivory until the certificate of ownership is issued to the holder of the license.
3. Any lose of form ESI prior to or after the hunting shall be reported to the Authority headquarters within 48hrs.

SECTION D: Declaration

I (Licensee).....hereby declare that the above information is a true record of the animal(s) hunted in the Republic of Zambia.

Date.....Signature.....

I (ZAWA representative).....hereby declare that the above information is a true record of the animal(s) hunted by the licensee.

Date.....Signature.....

RCVD MAR 3 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name		1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Bailey		Brian		
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address	
(b) (6) [redacted]		---	cindi.rulon@procargousa.com	

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Roswell	New Mexico	88203	Chaves	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
Same---				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Lynn Rulon atty in fact 02/22/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Pro Cargo- attn: Cindi Rulon -- enclosed FED EX envelope
   15619 Morales Rd. Houston, Texas 77032

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Cindi Rulon- 281-220-3176 – cindi.rulon@procargousa.com

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lion-- Panthera Leo

b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Upper Lupande, South Luangwa, near Mfuwe, Zambia- GPS S13 01 54.08 S and 31 53 04.97 E

b. Date wildlife is to be hunted:

July-August 2019

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Jason Stone of Stone Hunting Safaris

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

- NOT HUNTED YET -

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Trophy Trackers Consult.
Address: P O Box 39131
City: Lusaka, 10101
State/Province: Zamiba
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Operator Enhancement Report attached.....

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

The 28 day Safari hunt will cost $265.000. This includes 19 trophies and $160,000. in Daily Fees and Government Fees -- see attached report to see that these funds are used for anti-poaching efforts,scouts, camp employees from the community.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

See Attached Enhancement Report-------

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or ~~taxidermist~~ applying on behalf of a U.S. hunter or ~~foreign nation~~al, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 02/22/2019

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: **LUPANDE GMA**

   a. Years in business: **THREE YEARS**

   b. Name of company conducting hunt: **WESTGATE PROPERTIES LTD**

2. Name of concession: **UPPER LUPANDE GMA** Size in km²: **1,226 KM2 (LUPANDE)**

   a. Land tenure: __ Government lease **X** Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: **SEVEN YEARS** Can it be renewed? **X** Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **NEAREST TOWN IS MFUWE**

   e. If the concession borders a national park, please provide the park name: **SOUTH LUANGWA NATIONAL PARK AND NSEFU NATIONAL PARK**

   f. Description of general and distinctive habitat features and any water features: **HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS, LAGOONS AND THE LUANGWA RIVER FLOWS THROUGH THE GMA**

3. Are there any communities living in the concession? **X** Yes __ No

   a. If so, estimated number of people or villages in the concession? **ABOUT 250 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? **X** Yes __ No

   a. If so, estimated number of people or villages around the concession? **THE POPULATION IS SPARSE AROUND THE GMA**

5. Relevant game populations in the concession:[1]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**ABUNDANT**	**600 AND ABOVE**	**UPWARD**	**PATROL DATA AND OBSERVATIONS**
Lion	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Leopard	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Prey species	**ABUNDANT PREY BASE**	**ABUNDANT**	**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**

6. Total employment number: **25 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS.**

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	TWELVE	TWELVE
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	12	12	**THROUGHOUT THE YEAR**
Managers	1		
Maintenance	2		
Road opening/construction	30	25	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

a. Number of anti-poaching staff: **TWELVE**

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**

c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**

d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS (SETS OF 4 PEOPLE PER TEAM HEADED BY NATIONAL PARKS RANGERS.**

e. Description of anti-poaching equipment, vehicles, etc.: **ONE 4X4 LANDCRUISER,BICYCLES, SATELLITE PHONES AND FIREARMS**

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**

g. Do you offer rewards to poaching informants leading to arrest? **X Yes** __ No

h. Do you offer rewards to poaching informants upon conviction? **X** Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	130 800	140,000	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	30,000	43,000	50,000	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000		250,000	USED TO BUY A LANCRUISER IN THE FIRST YEAR FOR USE BY DNPWS

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	28,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _RANDOM PATROLS_____	15,000	17,000	25,000	RANDOM PATROLS USING OFFICERS FROM OTHER AREAS
Other: _____				
TOTALS	**645,400**	**263,100**	**574,000**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	185	127	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	12	5	2	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	85	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	7	4	2	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	478	352	275	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	17	8	9	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __**WE PAY 300,000 KWACHA AS COMMUNITY OBLIGATION AND 70,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES. WE HAVE BUILT PERMANENT STRUCTURES FOR CEREMONIES AND DUG BOREHOLES WHERE THERE IS NO CLEAN WATER.**_____

c. Does the company provide game meat to nearby communities? **X** Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **THE MEAT CONTRIBUTION PROGRAM: 50% OF EDIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	17,000	23,700	31,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		60,000	90,000	Most of the schools in this Area are in a deplorable state. Westgate safaris has embarked on a program to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries	75,600	97,200	124,200	EMPLOY SCOUTS FROM COMMINITY
Other community anti-poaching	20,000	25,000	30,000	ANTI POACHING AND ROAD BLOCKS FUNDED
Local government activities				
Water infrastructure improvements	40,000		40,000	DUG BOREHOLES
Sports teams funded	2,000	4,000	4,000	HELD AND HOSTED SOCCER TOURNAMENT
Construction materials donated	10,000	17,000	22,000	RUNNING WATER TOILETS
Other: _____				
Other: _____				
TOTALS	**147,600**	**203,200**	**310,200**	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	0	3(65%)	5 (70%)
-- hunting lion		0	1
-- hunting elephant		0	0
-- hunting leopard	0	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: **60%**

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare [redacted] ue and correct.

Signatu[redacted]

Name: [redacted] Title: DIRECTOR

Taxidermist: BRUSH COUNTRY

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE ON YOUR BEHALF.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# _____

Cell Phone (b) (6) [redacted]

Email address (b) (6) [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That x BRIAN BAILEY (Full Name of Person), residing at x (b) (6) [redacted] ROSWELL NM 88203 hereby constitutes and appoints each of the following persons - John Rulon CHB may act through any of its offices or any employees with Power of Attorney on file with this licensed broker as required by the Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed of said grantor from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize deliverable to said grantor: To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make, sign, declare, or swear to any statement, supplemental statement, schedule,, supplemental schedule, certificate of delivery, certificate of manufacture, certificate, and delivery abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filling in any customs district. To sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owners declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise: To sign and swear to any document, and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated said grantor. To authorize other Customs Brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantors name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor. And generally to transact at the customhouses in said district any and all customs business, including making, signing, and filling of protests under section 514 of the Tariff Act of 1930. In which said grantor is or may or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents; the forgoing power of attorney to remain in full force and effect until notice of revocation in writing is duly given to and received by the District Director of customs of the district aforesaid. If the donor of this power of attorney is a partnership, the said the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB , who is directed to forward all documents and inquiries concerning our Imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

Customs Rules on Discharge of Importers Liability for Duties

The U.S. Customs Service has issued a final amendment of the regulations to provide an alternative procedure for an Importer record to pay duties on imported merchandise through a licensed customhouse broker. Present rules provide for the payment of duties to Customs by a broker on behalf of the importer. Under the alternative procedure, the Importer may elect to submit to the broker a separate check or bank draft for the duties payable to the "U.S. Customs Service". The broker would then deliver the Importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients, advising that if I the client is an Importer of record, payment to the broker will not relieve the client of liability for Customs charges in the event that the charges are not paid by the broker. Brokers will be required to provide this notification to all active clients annually during the month of February. Additionally, brokers will be required to provide such Inform(b) (6) [redacted] effective date of the new rule. These amendments are effective as of September 27, 19

(Print name) x _____

has caused these presents to be sealed and signed:

(Signature) x _____

((Date) x 1-19-2019

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30488D / lion import / Brian Bailey

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, May 22, 2019 at 4:37 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Ms. Vargas,

I attached another page 4 of this application which I added more information. Mr. Bailey has not hunted yet so he has not been issued a hunt license yet. They will issue it to him when he arrives in Zambia.

Please add this information to the application.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

[Quoted text hidden]

Brian Bailey Zambia Lion application page 4.pdf
372K

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30488D / lion import / Brian Bailey

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, May 22, 2019 at 5:42 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Hi Ms. Vargas,

Hunters have to prepay to book their hunts. They may pay from 6 months to 1 year prior to the hunt. Hunting licenses are not issued until the hunter arrives into the country for the hunt.

[Quoted text hidden]

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NOT HUNTED YET - NO LICENSE ISSUED YET.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Trophy Trackers Consult.
Address: P O Box 39131
City: Lusaka, 10101
State/Province: Zamiba
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Operator Enhancement Report attached.....

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

The 28 day Safari hunt will cost $265.000. This includes 19 trophies and $160,000. in Daily Fees and Government Fees -- see attached report to see that these funds are used for anti-poaching efforts,scouts, camp employees from the community.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

See Attached Enhancement Report------

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30488D / lion import / Brian Bailey

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 4:13 PM
To: cindi.rulon@procargousa.com

Dear Ms. Rulon,

Ref: 30488D; Import of Mr. Brian Bailey's lion trophy, from Upper Lupande GMA, South Luangwa, Zambia, to be taken between July 2019 through August 2019.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. Please provide copies of the Zambia licenses/permits authorizing Mr. Bailey's lion hunt within Upper Lupande GMA.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by June 6, 2019 (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 30488D / lion import / Brian Bailey

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 5:22 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>

Dear Ms. Rulon,

Ref: 30488D

The application indicates that money was already paid for a hunt. Therefore, it seems as if a license should have already been issued. However, we are not completely clear on when Zambia issues licenses in relation to hunt dates. That said, regardless of when Zambia issues their licenses, according to our regulations, we can not have an incomplete application open longer than 45 calendar days and without a copy of Mr. Bailey's licenses, his application remains incomplete. Therefore, please ensure to provide a copy of his licenses prior to June 6, 2019. If they are not received by that date, we will have to administratively close Mr. Bailey's application. Once closed, we could not re-open it. A new application and new fees would have to be submitted for the request.

[Quoted text hidden]

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] FW: PRT#30488D -- Brian Bailey Lion application-- Lion

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, Jan 22, 2020 at 5:20 PM
To: "darcy_vargas@fws.gov" <darcy_vargas@fws.gov>

Dear Darcy,

There are 3 pages to this attachment…… your PRT email , the Lion kill sheet and a Zambia hunt license.

Please confirm that you can print out the 3 pages.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

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From: Cindi Rulon
Sent: Wednesday, January 22, 2020 9:08 AM
To: 'darcy_vargas@fws.gov' <darcy_vargas@fws.gov>
Subject: PRT#30488D -- Brian Bailey Lion application--

Dear Darcy,

I attached a hunting license to go along with the Lion import permit application that we submitted for Brian Bailey on 3/3/2019. Please add it to your file as additional data.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

SMINOLTA (A20012209031.pdf
824K

Cindi Rulon

From: SPITS-II Production Email Messenger <permits@fws.gov>
Sent: Wednesday, January 22, 2020 8:15 AM
To: Cindi Rulon
Cc: permits@fws.gov
Subject: Jan 22 2020 9:15:00; Acknowledgement letter for Permit No. "30488D""

BRIAN BAILEY
(b)(6)
ROSWELL, NM 88203
U.S.A.

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 03/03/2019; check number 2924 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA30488D-0While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices. While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

NPW FORM 12

ORIGINAL

0002870
S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: Peter Jason Stone NRC/Passport No. M00 238455

Residential Address: 6 Lawton Rd Hawick 3290

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: West Gate Safaris

DETAILS OF CLIENT

Name of client: Bryan Keith Bailey NRC/Passport No: (b)(6)

Tel/Mobile No.: (b)(6) Nationality:

Postal Address: Residential Address: (b)(6)

Type of Licence: Non Resident / Classical Licence No.: 0006157 New Mexico 88203

Date of Issue: 05/07/2019 Place of Issue: Chilanga

Name of Hunting Block where hunting was conducted: Upper Lupande

Hunting period From: 07/07/19 To: 21/07/2019

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
11 July 2019	C. Wildebeest	m	01		13° 00 296 / 31° 47 184	✓		#000 3285
12 July 2019	Puku	m	01		13° 01 273 / 31° 48 [illegible]	✓		#000 2495
13 July 2019	Lion	m	01		13° 28 [illegible] / 31° 28 [illegible]	✓		#000 3653

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
C. Wildebeest			27"	
Puku			17"	
Lion			27"	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were a[illegible] (b)(6) [illegible]dance with the terms and conditions of the Safari Hunting Licence and th[illegible]bove is the full amount paid by the client for the hunt.

Date: 04 Aug 2019 Signature of Client:

Date: 04 Aug 2019 Signature of Professional Hunter:

Date: 04 Aug 2019 Name of Wildlife Police Officer: KAMISA MALIPILA

Employment No. of W.P.O. 245824 / W.P.O

Signature of W.P.O.

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Serial No. 555555

NPW FORM 5B

S No.: 0035157

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2017

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue: Chilanga Date of Issue: 05/07/2019

DETAILS OF PERMIT HOLDER

Full name: Brian Keith Bailey SRC Passport No: SEC574851

Mobile No: E-mail address:

Postal Address: Nuetgate Properties Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1: Crossbows 2: Bow & Arrow 3:

Calibre(s) 1: Cross bows 2: Bow & Arrow 3:

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s):

Bird Hunting Licence No: 000427

Hunting Type: Non Resident

is hereby authorised to hunt in Lupande Game Management Area,

Upper Lupande Hunting block for days from 07/07/19

to 21/07/19 (Dates inclusive)

Amount Paid: $ 150 GRZ Receip: No. 043562

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
Official Stamp
5 JUL 2019
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA

Chairperson of the Committee

Note: Original - Copy to Applicant (Duplicate Copy) to Accounts - Triplicate to Commissioner - Quadruplicate to be retained in the Book

Cindi Rulon

From: SPITS-II Production Email Messenger <permits@fws.gov>
Sent: Wednesday, January 22, 2020 8:15 AM
To: Cindi Rulon
Cc: permits@fws.gov
Subject: Jan 22 2020 9:15:00; Acknowledgement letter for Permit No. "30488D""

BRIAN BAILEY
(b)(6)
ROSWELL, NM 88203
U.S.A.

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

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NPW FORM 12

ORIGINAL

0002870
S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: Peter Jaran Stone NRC/Passport No. M00 236455

Residential Address: 6 Lawton Rd Hawick 3290

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: West Gate Safaris

DETAILS OF CLIENT

Name of client: Brian Kieth Bailey NRC/Passport No. (b)(6)

Tel/Mobile No. +27 73 361 6619 Nationality: (b)(6)

Postal Address: Residential Address:

Type of Licence: Non Resident / Classical Licence No.: 0006157 New Mexico 88203

Date of Issue: 05/07/2019 Place of Issue: Chilanga

Name of Hunting Block where hunting was conducted: Upper Lupande

Hunting period From: 07/07/19 To: 21/07/2019

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
11 July 2019	C. Wildebeest	m	01		13° 00 296	✓		#000 3285
12 July 2019	Puku	m	01		13° 01 [illegible]	✓		#000 4495
13 July 2019	Lion	m	01		13° 00 [illegible]	✓		#000 3653

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
C. Wildebeest			27"	
Puku			17"	
Lion			27"	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 04 Aug 2019 Signature of Client .....

Date 04 Aug 2019 Signature of Professional Hunter .....

Date 04 Aug 2019 Name of Wildlife Police Officer KAMISA MALIPITA

Employment No. of W.P.O. 245824/W.P.O

Signature of W.P.O. .....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Serial No. 555555

NPW FORM 5B

S No.: 0335157

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue: Chilanga Date of Issue: 05/07/2019

DETAILS OF PERMIT HOLDER

Full name: Brian Keith Bailey SRC Passport No: (b)(6)

Mobile No: E-mail address:

Postal Address: Westgate Properties Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1: Crossbows 2: Bow & Arrow 3:

Calibre(s) 1: Cross bows 2: Bow & Arrow 3:

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s):

Bird Hunting Licence No: 000427

Hunting Type: Non Resident

is hereby authorised to hunt in Lupande Game Management Area,

Upper Lupande Hunting block for days from: 07/07/19

to: 21/07/19 (Dates inclusive)

Amount Paid: $ 150 GRZ Receip: No: 043562

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
Official Stamp
5 JUL 2019
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA

Chairperson of the Committee

Note: Original copy to the Applicant - Duplicate to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] PRT#30488D -- Brian Bailey Lion application--

Vargas, Darcy <darcy_vargas@fws.gov> Wed, Jan 22, 2020 at 1:57 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>

Dear Ms. Rulon,

Ref: 30488D

Your email, sent at 10:09 A.M. (Eastern Time) today, states that the email includes a copy of Brian Bailey's Zambian hunting license. However, the email does not contain such attachment. Instead, the document attached to your email is a copy our database's automatic message letting you know that the referenced application was received in this office on March 3, 2019.

Also, please be aware that you were notified on several occasions that a complete application was required to be sumitted prior to June 6, 2019. Therefore, I will forward your request to my supervisor to determine if a special exemption can be made. However, before I do so, please reply to let me know if you are able to provide a copy of Mr. Bailey's hunting license, inlcuding Zambia's authorization to take a lion (Zambia typically issues a licese to hunt within a particular area and a separate license that lists the species authorized to take).

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] PRT#30488D -- Brian Bailey Lion application--

Cindi Rulon <Cindi.Rulon@procargousa.com> Wed, Jan 22, 2020 at 10:07 AM
To: "darcy_vargas@fws.gov" <darcy_vargas@fws.gov>

Dear Darcy,

I attached a hunting license to go along with the Lion import permit application that we submitted for Brian Bailey on 3/3/2019. Please add it to your file as additional data.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

Direct 281.220.3176
Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

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824K

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] FW: PRT#30488D -- Brian Bailey Lion application-- Lion

Cindi Rulon <Cindi.Rulon@procargousa.com> Thu, Jan 23, 2020 at 9:32 AM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Thank you, Darcy.

I appreciate your update!

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports

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Main Tel# 281.590.5500
Direct Fax 281.664.4440

15619 Morales Rd.
Houston, TX 77032

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[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] FW: PRT#30488D -- Brian Bailey Lion application-- Lion

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Jan 23, 2020 at 9:26 AM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>

Dear Ms. Rulon,

Ref: 30488D

Thank you for replying so quickly. I do see all 3 attachments now. Yesterday, we were having trouble with our network and systems, so I apologize if that was the reason I couldn't see all of the documents yesterday.

Your application has already been forwarded to my supervisor for her review and decision of approval.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

[Quoted text hidden]

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

May 5, 2020

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.05 19:41:31 -04'00'

Memorandum

From: Mary Cogliano

To: Permit File PRT-30488D

Enhancement Finding

Applicant: Brian Bailey (PRT-30488D)

Summary

Brian Bailey submitted an application to import one male African lion (*Panthera leo melanochaita*), which he hunted July 13, 2019, from Zambia, for the purpose of enhancing the propagation and survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion out of Zambia requires the prior issuance of a CITES export permit from the CITES Management Authority of Zambia; and import into the United States requires the prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service, therefore, may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and information received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken on July 13, 2019, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

U.S. Governance of the Lion:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion (79 Fed. Reg. 64472.). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service

published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (80 Fed. Reg. 79999). The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application demonstrating that the activity meets the requirements for issuance under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in future findings for import of sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

Our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Bailey's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Upper Lupande Game Management Area (GMA), in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service in

making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.,* population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all

relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Bailey's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we review a number of factors. Some of the factors we considered in making this finding include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country.

Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives for local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. In this finding, we examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the proposed import of this trophy in accordance with the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how Mr. Bailey's participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range country and interested

parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for our finding:

In February 2020, the Service received an updated "Enhancement and Non-detriment Finding for African lion Sport Hunting in Zambia" from Zambia's Department of National Parks and Wildlife (DNPW). This updated finding notes, "since the re-introduction of trophy hunting for lion in 2016, the DNPW is implementing an adaptive management strategy that limits the off-take of lions. To support this approach, it has experimented in implementing a robust age-based monitoring programme that will become binding for the 2020 hunting season." Prior to this February 2020, update, in February 2016, the Service sent a letter to Zambia's Wildlife Authority with questions about the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether the management addresses the three main threats that were identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. In the letter, the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, aids the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to this letter, Zambia's DNPW (DNPW 2016), provided documentation, dated May 5, 2017, describing Zambia's lion population and management plans.

Since 2016, the Service has met with officials from Zambia multiple times to receive updated information and clarify questions the Service has had on the status of and management of lions in Zambia with respect to imports of sport-hunted lion trophies. For example, more recently, Service representatives met with Zambian officials in February, 2020, at the annual Safari Club International Convention in Reno, Nevada; November, 2019, at the 17th African Wildlife Consultative Forum in Zimbabwe; and November 2018, at the 16th African Wildlife Consultative Forum in Uganda.

The documentation the Service received from DNPW in February, 2020, and May, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, information received from interested parties, and Mr. Bailey's application are the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS), which was responsible for the protected area network. In 1999, the Government of

Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capacity, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with its law enforcement capabilities due to inadequate resources.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Zambia's vision as stated in the Strategy is to have a secure, viable, and well-managed wild population of lions that will support conservation of biodiversity in harmony with human development. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies and projects that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW 2016). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work-time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. Under DNPW, *the Wildlife Law Enforcement Unit* currently has a staff compliment of 1,525 Wildlife Police Officers covering an estimated 236,376 km^2 of wildlife estates (equivalent to approximately 155 km^2/Wildlife Police Officer) (DNPW 2020, p. 18). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under Zambia's Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition, Zambia is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including making findings by the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. Zambia has provided to us a copy of its May 5, 2016, non-detriment finding for lions, which it updated in January, 2020. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." The Scientific Authority further explained that its positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa. As of 2020, additional genetic analyses are also being conducted by Zambia Lion Project, including assessments that will help inform DNPW in future efforts to translocate lions among different

regions in Zambia in order to re-establish lion populations in historic lion range e.g., West Lunga complex.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). In 2018 the Zambia Carnivore Programme (ZCP 2018) intensively monitored 15 prides and 15 coalitions totaling 173 lions across Northern and Central Kafue in 2018 extending the study area to the remote Kasonso-Busanga GMA. It is believed that the lion population in this ecosystem is stable or possibly increasing (DNPW 2020, p. 11). A report by the Democratic staff of the House Committee on Natural Resources concluded that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al*. 2016). As of 2016, Africa had the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by the year 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at

least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al*. 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts. Poverty and the necessity for rural people to obtain some income are the main drivers of bush meat poaching in Zambia. Since 2016, DNPW has continued to work with ZCP and Conservation South Luangwa (CSL) to mitigate snaring by-catch through intensive monitoring of collared wild dog and lion groups through ground, aerial and satellite/ GPS tracking, coupled with data-directed anti-snaring patrols, field-based veterinarians. In the Kafue ecosystem, DNPW worked with ZCP and Panthera through their newly-formed anti-poaching units, as well as, with hunting operators' anti-poaching units, which confirmed no reports of snared carnivores in 2018, with one lion treated for an old snare injury.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe had been imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions was a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding, breeding, and commercial use (i.e. walking and petting) of captive-bred lions is banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

NGOs are also a source of supplemental revenue sources. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Although the success of the moratorium cannot be fully assessed, there is some information available that indicates that lion populations are stable or increasing (DNPW 2020, pp. 10-11).

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2020, 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting

blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelope system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes are only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2020, 2016). As of 2018, the quota was reduced to 31. The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW has transformed the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The guidelines were revised in 2019 from those developed in 2016 for lion and in 2018 for lion and leopard and are meant as an instrument to provide technical guidance on the scientific methodologies to be used on lion aging and on some methodologies for lion and leopard hunting and status monitoring. These guidelines also incorporate details pertaining to the monitoring of leopard hunting and status. The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Since the adoption of this practice in 2016, DNPW has introduced a legally binding regulation that will enter into force for the 2020 season (DNPW 2020, p. 42). The Guidelines shall be regularly

updated to reflect advances in scientific knowledge in order to guide technically the implementation of the regulations. The new management approach to Lion hunting in Zambia is based on three pillars: i) a conservative, precautionary quota, well below one of the recommended thresholds for sustainability, ii) an age–based harvest limit and strong monitoring of lion offtakes, and iii) significant and direct community benefits. This will ensure that lion hunting in Zambia is sustainable and does not negatively affect the population. In addition, in the hunting concession agreements signed in 2015, no hunting outfitter has been guaranteed a lion on quota. It is made clear that the quota for any species shall be based on scientific methods including the latest available survey and aging techniques.

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. DNPW also receives funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.

- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and permit issuance criteria (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated its desire to maintain the long-term conservation of its lion population with its 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that it has established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy-hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has identified how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

As described under <u>Current Lion Status in Zambia</u> above, Zambia has taken strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2020, 2016). Monitoring, local community benefits, human lion-

conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Bailey's hunting and subsequent import of this lion provides an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species is positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion trophy would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Bailey

will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Bailey, in managing the lion populations in GMAs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency, they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Bailey.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion trophy will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Brian Bailey.**

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016 (rev Jan 2020). Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

Intra-Service Section 7 Biological Evaluation Form

Originating Person: Amy Brisendine Date: April 7, 2020

Telephone Number: 703-358-2005

I. **Service Program and Geographic Area or Station Name**: Branch of Permits, Division of Management Authority, International Affairs

II. **Flexible Funding Program** (e.g. Joint Venture, etc.) if applicable: N/A

III. **Location**: 5275 Leesburg Pike, MS: IA, Falls Church, VA 22041-3803

IV. **Species/Critical Habitat**:

Southern and Eastern African lion (*Panthera leo melanochaita*)

Critical Habitat: N/A

V. **Project Description:** Describe proposed project or action or, if referencing other documents, prepare an executive summary (attach additional pages as needed):

As described in the permit application, 30488d, Brian Bailey, has requested a permit to import a trophy of one lion that he lawfully hunted in Zambia. The import is for personal purposes.

VI. **Determination of Effects:**

(A) Description of Effects: Describe the action(s) that may affect the species and critical habitats listed in item IV. Your rationale for the Section 7 determinations made below (B) should be fully described here.

Issuance of the requested import permit by the Branch of Permits will result in the importation of one personally sport-hunted lion that has been lawfully taken in Zambia on the date specified in the permit application.

The trophy will be accompanied by the required CITES export permit issued by the CITES Management Authority of Zambia.

The requestd U.S. Federal Fish and Wildlife import permit does not authorize the killing of an African lion; the authorization to hunt and lawfully take a lion is under the purview of the government of Zambia. Therefore, the proposed action of issuing a Federal Fish and Wildlife import permit for this lawfully hunted lion will not directly or indirectly affect individuals of listed or proposed species or designated/proposed critical habitat of such species.

(B) Determination: Determine the anticipated effects of the proposed project on species and critical habitats listed in item IV. Check all applicable boxes and list the species (or attach a list) associated with each determination**.**

Determination

No Effect: This determination is appropriate when the proposed project will not directly or indirectly affect (neither negatively nor beneficially) individuals of listed/proposed/candidate species or designated/proposed critical habitat of such species. **No concurrence from DSA/ESFO required.** **X**

May Affect but Not Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to cause insignificant, discountable, or wholly beneficial effects to individuals of listed species and/or designated critical habitat. **Concurrence from DSA/ESFO required.** _____

May Affect and Likely to Adversely Affect: This determination is appropriate when the proposed project is likely to adversely impact individuals of listed species and/or designated critical habitat. **Formal consultation with DSA/ESFO required.** _____

May affect but Not Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project may affect, but is not expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Concurrence from DSA/ESFO optional.** _____

Likely to Jeopardize candidate or proposed species/critical habitat: This determination is appropriate when the proposed project is reasonably expected to jeopardize the continued existence of a species proposed for listing or a candidate species, or adversely modify an area proposed for designation as critical habitat. **Conference with DSA/ESFO required.** _____

MARY COGLIANO Digitally signed by MARY COGLIANO Date: 2020.05.05 19:46:42 -04'00'

Signature:_____ Date: _____
[Supervisor at originating station]

Reviewing Service Office (DSA or ESFO) Evaluation (check all that apply): N/A

A. **Concurrence** _____ **Nonconcurrence** _____

Explanation for nonconcurrence:

B. Formal consultation required _____
List species or critical habitat unit

C. Conference required _____
List species or critical habitat unit

Name of Reviewing Office: _____

Signature: _____Date: _____

Permit Number: MA30488D-0
Effective: 05/06/2020 Expires: 05/05/2021

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

AMY BRISENDINE
Digitally signed by AMY BRISENDINE
Date: 2020.05.06 09:07:41 -04'00'
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
BRIAN BAILEY
(b)(6)
ROSWELL, NM 88203
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2019 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2019 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD MAR 5 2019

(b) (6)

[redacted]

TRANSMITTAL

To:	U.S. Fish & Wildlife Service
	Division of Management Authority
	Branch of Permits, MS: IA
	5275 Leesburg Pike
	Falls church, VA 22041-3803

Date:	2-27-19
Project No.:	
Project Name:	
Location:	
DEI Job No.	

We are sending you the following:

Copies	Date	Description
1		Completed Application for 1 Lion for Chris Peyerk with Check # 21266
1		Completed Application for 2 Leopards for Chris Peyerk with C21265heck #
1		Return UPS Envelope for Chris Peyerk
1		Completed Application for 1 Leopard for Irvin Rupersburg with Check # 21269
1		Completed Application for 1 Elephant for Irvin Rupersburg with Check # 21270
1		Return UPS Envelope for Irvin Rupersburg
1		Completed Application for 1 Lion for Chris Shea with Check # 21268
1		Completed Application for 2 Leopards for Chris Shea with Check # 21267
1		Return UPS Envelope for Chris Shea

Transmitted for your action:

Comments

Distribution: File

By: Linda Jurda-Wensink

An Equal Opportunity Employer

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 5 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Shea	Christopher	Michael	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Shelby Township	MI	48315	Macomb	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

02/18/19

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      Chewore Safari Area - North

   b. Date wildlife was hunted:

      04-Oct-2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Big Five Safaris (Pvt) LTD, HOP0143, Chewore North Safari Area, 54 Edinburg Rd., Vainona, Borrowdale - P O Box CY 1949, Harare

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Consultants International, 4 Josiah Chinamano Road
Belmont, Bulawayo, Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature (b) (6) _____ Date: 02/18/19

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAY 11 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name		1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Lott		James	Dan	.
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address	
(b) (6)				

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Roswell	GA	30075	Fulton	U.S.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 3/1/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Same

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo - Lion

   b. Sex (if known).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   South Africa - Limpopo - Cosmopolite (Conservancy)
   Nearest town - Lephalale
   LP0619

   b. Date wildlife is to be hunted: August 2, 2019 to August 9, 2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Riaan Vosloo
   Shingani Safaris
   www.shingani.com

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   Not yet taken

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Not yet hunted

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name: Troplex Taxiderny
Address: 4 Hendrik Pistorius Ave | admin@troplex.co.za
City: Lephalale
State/Province:
Country, Postal Code: South Africa 0556

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
No

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
Trophy fee to be paid - $ 15,000
According to the outfitter the lion concession supports 25 families - 14 people directly employed by him. There are more game per square mile than anywhere else.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
See above
Most of the employees are involved in hunting and managing habitat for various game.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) [redacted] Date: 3/1/2019

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

G.P.-S.

Interimpafed

ORDINARY PERMIT

PERMIT NUMBER: O **No.** 08685

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

LEMA Act 07 of 2003

NAME	Capricorn permit office
ADDRESS	90 Bok Street
	Polokwane 0700
PROVINCE	Limpopo

DETAILS OF PERMIT HOLDER

NAME	James Dan	ID NO.	
SURNAME	Lott	PASSPORT NO.	(b)(6)
	POSTAL ADDRESS		(b)(6)
ADDRESS			Roswell
ADDRESS			/
ADDRESS			/
TOWN			GA 30075
POSTAL CODE			USA
PROVINCE			

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	Riaan Vosloo
NAME AND SURNAME: RESPONSIBLE PERSON	Johannes Lodewyk van Rensburg
NAME AND SURNAME OF AGENT	/
PHYSICAL ADDRESS OF FACILITY	Farm Cosmopolite 141 LR
PHYSICAL ADDRESS OF FACILITY	Bathmore
DISTRICT	Capricorn
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	One (1)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt

DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM
WILDLIFE TRADE & REGULATION
POLOKWANE PERMIT OFFICE
2019 -08- 05
PRIVATE BAG X 9555
POLOKWANE 0700
LIMPOPO PROVINCE

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:

NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	James Dan Lott
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Riaan Vosloo
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Riaan Vosloo
WEAPON AND METHOD OF HUNTING	walk & stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 05/08/2019	TO:	05/09/2019
RECEIPT NUMBER	1129957 (R5300-00)		

SIGNATURE OF ISSUING OFFICER:

SIGNATURE OF PERMIT HOLDER: Riaan Lott

DATE STAMP:

INTERGRATED: NEMBA ACT 10 OF 2004

HUNTING SPECIAL CONDITIONS NO: 08685

DEPARTMENT OF ECONOMIC DEVELOPMENT ENVIRONMENT & TOURISM
WILDLIFE TRADE & REGULATION
POLOKWANE PERMIT OFFICE
2019 -06- 05
PRIVATE BAG X 9505
POLOKWANE 0700
LIMPOPO PROVINCE

1. This permit does not absolve the holder thereof in obtaining any other permit, licence, certificate or document as may be required by any other relevant legislation from any province or country.
2. This permit must be signed by the permit holder and must be in his/her possession for the duration of the hunt.
3. This permit does not allow the hunting with a bow and arrow or any other prohibited method unless specified on the permit.
4. This permit does not authorise the hunting during the night, unless specified on the permit
5. This permit does not allow the hunting of listed species which is under the influence of a tranquilising, narcotic, immobilising or similar agent,
6. If a wounded animal crosses into a neighbouring country, province or property the Department as well as the country where the animal entered into must be notified within 24 hours
7. No driving of listed species for the purpose of hunting is authorised.
8. The Department reserves the right to nominate an official to be present during any or all hunts conducted in accordance with this permit.
9. The outcome of the hunt in the case of TOPS threatened species must be reported within two working days after the listed species was hunted, the hunt terminated or in the case where the hunt was not successful. This office reserves the right to inspect the hunting sight or any relevant product of such hunt.
10. In the case where trophies will not be exported from RSA the permit holder must immediately apply for a TOPS Possession Permit in the case of TOPS species
11. Elephant tusks must be marked by an Environmental officer
12. A TOPS Ordinary permit is r equired to convey any part of any TOPS species hunted to any facility within the country, except a taxidermy
13. The Department may require scientific information or material from the animal hunted.
14. The non-compliance with the permit details as well as these special conditions will result in criminal charges and may influence the granting of similar permits to the permit holder.
15. Issued in terms of the Limpopo Environmental Management Act 2003, Act no. 7 of 2003.
16. An elephant/ crocodile may not be hunted next to the water's edge of an international border
17. In the case of dangerous game the minimum calibre requirement is a 375.
18. This permit does not absolve the applicant from conforming to the norms and standards for hunting
19. No put and take system of hunting is allowed
20. No animal may be hunted in a controlled environment
21. The use of dogs may only be used to flush birds or track wounded animals
22. All clients must be accompanied by a PH

Permit Officer's Signature

Permit Holder's Signature

(I acknowledge, accept and understand fully the permit condition as described)

DEPARTMENT OF ECONOMIC DEVELOPMENT ENVIRONMENT & TOURISM
WILDLIFE TRADE & REGULATION
POLOKWANE PERMIT OFFICE
2019 -09- 05

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] Re: Acknowledgment letter #32568D

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Tue, Aug 20, 2019 at 7:03 AM
To: "J. Dan Lott" <lott1965@gmail.com>
Bcc: emma_nelson@fws.gov

Dear Mr. Lott,

Thank you for the additional information. It has been added to your application file.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Mon, Aug 19, 2019 at 10:11 AM J. Dan Lott (b)(6) rote:

> Here is a copy of the permit. Please add to my
> J. Dan Lott
> 32568D
>
> On Wed, Aug 14, 2019 at 10:32 AM Management Authority, FWHQ <managementauthority@fws.gov> wrote:
>
> > Dear Mr. Lott,
> >
> > Attached is your Acknowledgment letter for CITES permit #32568D.
> >
> > Hope you have a great day.
> >
> > **********
> >
> > U.S. Fish and Wildlife Service
> > International Affairs Program
> > Division of Management Authority
> > Branch of Permits
> > 1-800-358-2104
> > **Reply to: ManagementAuthority@fws.gov,** http://www.fws.gov/international/permits/

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

Stamp out extinction with the Save Vanishing Species Stamp

Nelson, Emma <emma_nelson@fws.gov>

Re: [EXTERNAL] PRT number MA32568D-0

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Fri, Nov 22, 2019 at 3:21 PM
To: "J. Dan Lott" (b)(6)
Bcc: emma_nels

Good afternoon Dan,

Thank you for your inquiry. Your application, #32568D, that was received on March 11, 2019, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Thank you,
U.S. Management Authority, Branch of Permits.
****

Please review the U.S. Fish and Wildlife Service's Office of Law Enforcement's webpage on importing and exporting commercial wildlife shipments. Contact the Office of Law Enforcement to see if your situation applies.

Wildlife (including parts and products) imported or exported from the U.S. must be declared to the U.S. Fish and Wildlife Service. Please contact the Wildlife Inspector at the appropriate designated port to learn the requirements for your shipment.

Contact USDA-APHIS to determine their quarantine and health certificate requirements for import and export. Visit their website or call the National Import Export Services (NIES) Call Center: 301-851-3300.

Please check with the CDC for their requirements.

Contact the State and foreign country to check on their requirements.

We encourage permit applicants to review our tips and reminders for completing applications.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Wed, Nov 20, 2019 at 10:14 AM J. Dan Lott (b)(6) rote:

> Hello
> I would like to inquire about the status of my application to import an African lion that was taken August 8, 2019 in South Africa. Thank you.
> Dan Lott

Re: [EXTERNAL] Application #MA32568D-0

Management Authority, FWHQ <ManagementAuthority@fws.gov>
Wed 7/15/2020 2:48 PM
To: J. Dan Lott <lott1965@gmail.com>

Good afternoon Ind. Lott,

Thank you for your inquiry. Your application, PRT-32568D, that was received on March 11, 2019, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Thank you,
U.S. Management Authority, Branch of Permits.

****
U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
Reply to: ManagementAuthority@fws.gov
http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
****
New mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
MS: IA
5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From: J. Dan Lo <lo 1965@gmail.com>
Sent: Tuesday, July 7, 2020 9:03 AM
To: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Subject: [EXTERNAL] Applica on #MA32568D-0

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello
It has been almost a year since my application was submitted. Authorities in South Africa have consistently indicated that lion is not on the cusp of being endangered.

So I respectfully request that my application can be approved so that shipment can be arranged. Thanks for your consideration.

Best regards,
Dan Lott
(b)(6)

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD APR 15 2019

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Noland	Weldon	G	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Riverton	Utah	84065	Salt Lake county	United States

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001

(b) (6)

04-11-2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   Weldon Noland (b) (6) Riverton Ut. 84065

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Weldon Noland (b) (6)
   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo genus,Species (Lion)

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Zimbabwe, Matendere Ranch, Save Valley Conservancy, Nyika Province, Masivngo (nearest city)
   19.992789 32.109837

   b. Date wildlife is to be hunted: August 21 2019 to Septmeber 09 2019

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Save Safaris Mike Payne

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   N/A

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I Have Not hunted yet

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name: Mike Payne
   Business Name: Save Safaris
   Address: 54 Harare Dr.
   City: Chisipite
   State/Province: Harare
   Country, Postal Code: Zimbabwe

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted? No

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government? Trophy fee = $15000.00
      Hunting fee =$39600.00

      Total = $54600.00

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted? No

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: (b) (6) [redacted] Date: 04-11-2019

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Save Safaris
   a. Years in business: 9 years
   b. Name of company conducting hunt: Save Safaris
   2. Name of concession: Matendere and mapari ranches Size in km²: +- 364
   a. Land tenure: __ Government lease __ Community __ Private ranch __ Private conservancy x
   b. Length of concession agreement: 10 years Can it be renewed? x Yes __ No
   c. Length of renewal, if applicable: 5 years
   d. Estimated total amount received in trophy fees last year, if applicable: $ 129200.00
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   annual aerial game count, own anti poaching units and conservancy anti poaching unit local employment where possible
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   In the north of the Save Valley Conservancy. Masvingo
   g. If the concession borders a national park, please provide the park name: N/A
   h. Description of general and distinctive habitat features and any water features:
   Mapari has the Devuli and Save Rivers as a boundary, matendere has a large dam to provide water

3. Are there any communities living in the concession? __ Yes x No
   a. If so, estimated number of people or villages in the concession? Nil
4. Are there communities bordering this concession? x Yes __ No
   a. If so, estimated number of people or villages around the concession? +- 600 people
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense	350	up	aerial surveys and scouts on the ground
Lion	Dense	80 - 90 (M + F)	up	
Leopard	Dense	60 - 70 (m + f)	up	Spoor surveys
Prey species	Dense	very large numbers	up	

6. Total employment number: 43
   a. Please identify the number and type of all employees:

2 management, 1 camp manager, 5 camp staff, 14 anti poaching, 2 tractor drivers, 6 trackers,13 general

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	2	1
Trackers	6	6
Anti-poaching scouts/rangers	14	8
Other anti-poaching		
Cooks/housekeepers	5	5
Community coordinators	1	1
Managers	3	2
Biologists	0	
Others: _____	14	14

7. Number of staff employed in the off-season: 42

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	20	14	all year
Managers	2	2	all year
Maintenance	6	6	all year
Road opening/construction	8	8	all year
Community relations personnel	1	1	all year
Others: Camp staff	5	5	all year

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 14 - 20

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

   c. Months during which anti-poaching patrols are conducted: all year

   d. Number of anti-poaching patrols per month: Always a team out daily

   e. Description of anti-poaching equipment, vehicles, etc.: toyota landcruiser mazda 4 x 4 pick up

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The managers co ordinate with the local police and National Parks

   g. Do you offer rewards to poaching informants leading to arrest? x Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? x Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? +- $48500.00 USD on average. This year we are replacing radios and equipment so it will be higher

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	29120.00	30000.00	40040.00	We also contribute to the Save Valley Conservancy anti poaching unit
Equipment				
Vehicles	2130.00	2300.00	14400.00	Another vehicle purchased 2017
Petrol Diesel	3000.00	3500.00	3500.00	
Rewards paid	1000.00	400.00	600.00	
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	43	26	36	
Elephant carcasses observed				nil from poaching
Lion carcasses observed				nil from poaching
Leopard carcasses observed				nil from poaching
Ivory poachers arrested				nil from poaching
Meat poachers arrested	10	8	8	
Other poachers arrested				
Poachers convicted	10	8	8	
Snares/gin traps collected	460	330	250	no gin traps
Firearms confiscated	2	0	0	muzzle loaders
Vehicles confiscated	0	0	0	
Bicycles confiscated	1	0	0	
Boats/nets confiscated	1	0	0	net
Tusks recovered	0	0	0	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? ✓ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? Voluntary donations to local clinic/school

c. Does the company provide game meat to nearby communities? ✓ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: If elephant trophies are hunted up to 10 ton frsh meat delivered to surrounding community

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. PAC lion and elephant shot and chased back to the SVC. Occasionally lion darted and returned to SVC. PAC is a weekly occurance and lion pressure on the cattle around the svc is big

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? Nil

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	SVC policy is not to pay compensation. Where possible to help with PAC or to chase the animals back into			
Lion	the conservancy			
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? USD

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	Across the whole SVC around $50000.00 per year in donor and own funding			
Education (e.g., school fees, supplies)	as above			
Health (e.g., clinics, offices)	Donation of meat and medical supplies like bandages, maternity pads etc			
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching	500	600	600	Payments to informers
Local government activities				
Water infrastructure improvements				
Sports teams funded	Soccer balls donated			
Construction materials donated	15000.00			Help with building a dam
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay? 90% from the US

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2 2016: 2 2017: 0	2015: 1 2016: 1 2017: 2	2015: 4 2016: 3 2017: 4	2015: 18 2016: 14 2017: 19
Percentage of U.S.	2015:	2015:	2015:	2015:

clients	2016: 2017:	2016: 2017:	2016: 2017:	2016: 2017:
Trophy fees paid by U.S. clients	2015: 440000 2016: 312000 2017: 410000	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:
90%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: Melanie Payne Title: Public Officer

All trophies are aged by G Connear who is employed by the SVC. This has been ongoing for more than 10 years and quota is based on the number of animals hunted the previous year that are of the minimum recommended age or older. Penalty's on quota if underage animals are hunted. All properties on the SVC have water points fed either from boreholes or dams built by the concession holders. There is a number of research teams on the conservancy that study all the properties, there is the African wild dog foundation, large carnivore research done in conjunction with road counts for spoor and the Lowveld rhino trust that monitor the black and white rhino populations as well as provide assistance with anti poaching resources. There is also the Special Species Protection Unit which is paid for the by SVC and donors which does anti poaching with special emphasis on pangolins, rhino and elephant. This includes the use of a microlight, dog unit and several vehicles and motorbikes.

From: King, Jenna D
To: (b) (6) [redacted]
Cc: cf@conservationforce.org; Brisendine, Amy
Subject: CITES Permit Application #37069D
Date: Thursday, August 13, 2020 6:19:42 PM

Hi Mr. Noland,

This email is in regard to your CITES permit application #37069D to import a lion trophy from Zimbabwe. On the application, it was indicated that the hunt was to take place between 8/21/2019 and 9/9/2019. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

(b) (6)

(b) (6)

(b) (6)

† Licensed in Texas
* Licensed in Mississippi
◊ Licensed in New York
Ω Licensed in Pennsylvania
£ Licensed in Oklahoma
µ Licensed in Illinois

(b) (6)

In Reply Refer to: FWS/AIA/DMA/PRT-02378D – Reconsideration

US Fish & Wildlife Service
5275 Leesburg Pike, MS:IA
Falls Church VA 22041-3803

Dear Mary Cogliano, Chief:

This letter is in response to your denial for my request of a permit number to import a sport-hunted trophy of one lion (Panthera leo melanochaita) I am requesting a reconsideration of my application on the below bases.

After reviewing your reply, it was brought to my attention that we had the incorrect permits and information on my application and after conferring with my guides I was able to obtain the correct permits that have been submitted and approved by the parks. I have also been advised that they reached out to USFW confirming that all the permits are now in the appropriate order. Please review the corrected information attached.

If you have any questions you can reach me at (b) (6) cell (b) (6) office or via email to (b) (6) additionally Christina Nicklas my office manger may also be able to help you with any questions, she can be reached at (b) (6) office or (b) (6)

Sincerely,

(b) (6)

Jason C. Webster

Enclosures

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Webster	Jason	C	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Houston	Texas	77036	Harris	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and a (b) (6) y false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature o amped signatures) Date of signature (mm/dd/yyyy) 4-15-19

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Same as applicant or Christina Nicklas (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Lion - Leo Melanochaita

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Upper Lupande, GPS Coordinates 13.00598, 32.08455

   b. Date wildlife was hunted:

July 21, 2018 - Aug 10, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Westgate Properties Ltd

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Mike Borman, Bangweulu Taxidermy Limited, 4142/K Chidwema Rd New Kasama Lusaka Zambia

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
   Name: Mike Borman
   Business Name: Bangweulu Taxidermy Limited
   Address: 4142/K Chifwema Road
   City: New Kasama
   State/Province: Lusaka, Zambia
   Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   Unknown

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

   Unknown

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

   Unknown

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: (b) (6) Date: 4-15-19

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

NPW FORM 12

ORIGINAL

S/No. 0001618

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: M G [redacted] NRC/Passport No.: (b) (6) [redacted]

Residential Address: (b) (6) [redacted], LEOPARDS HILL, LUSAKA

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: WESTGATE SAFARIES

DETAILS OF CLIENT

Name of client: J. WEBSTER NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No. c/o WESTGATE Nationality: USA

Postal Address c/o WESTGATE Residential Address 6903 WHITEHILL LANE, RICHMOND, TX. USA

Type of Licence: CLASSIC Licence No.: 0000666

Date of Issue: 13/7/18 Place of Issue CHILANGA

Name of Hunting Block where hunting was conducted: UPPER LUPANDE

Hunting period From 20/7/18 To 11/8/18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
7/8/18	LION	M	1		13.00548 32.08455	✓		LIC # 0000607

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
LION				23 3/4"

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the amount of foreign currency stated above is the full amount paid by the client for the hunt.

Date 11/8/18 Signature of Client: (b) (6) [redacted]

Date 11/8/18 Signature of Professional Hunter:

Date 11/8/18 Name of Wildlife Police Officer: KAMECK MWAIA

Employment No. of W.P.O. 277119

Signature of W.P.O.

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
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RENEE SNIDER

March 22, 2018

RCVD MAR 27 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find four applications to import sport-hunted trophies.

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km^2 property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over $61,000/year in anti-poaching, $45,000/year in community projects, and $30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

RCVD MAR 27 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cunningham	Samuel	James	na

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block, U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Amarillo	Texas	79124	Potter	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
same

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
same	same	same	same	same

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete ar[redacted]ge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C

(b)(6)

Signature o[redacted] (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 03/19/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   Same

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Applicant or attorneys with Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

na

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo (lion)

   b. Sex (if known). male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   South Luangwa, Zambia in Nyamvu and West Petauke GMA, Nyimba is closest town

   b. Date wildlife is to be hunted: 09/23/2019-10/15/2019

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   WH van Noordwyk, Nyamvu Safaris and Mopane Safaris

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   na

   b. Date wildlife was hunted: na

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   na

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   na

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Douglas Cockroft
Business Name: Splitting Image Taxidermy
Address: PO Box 27582, Greenacres
City: Port Elizabeth
State/Province: East Cape
Country, Postal Code: South Africa 6057
Telephone: +27 41 811 9729 email: info@splitimagetaxidermy.co.za

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: (b)(6) Date: 02/19/2018

    Be aware that there may be permit or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b)(6)

Name: Samuel James Cunningham

Date: 03/19/2018

NYAMVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: ZAID137@HOTMAIL.COM

I. DESCRIPTION OF COMPANY AND CONCESSION

Nyamvu Safaris, Ltd. has been operating Nyamvu Game Reserve since April 2005. The Game Reserve provides habitat for a range of species including lion, kudu, leopard, buffalo, and elephant and is also a None Fenced Game Reserve but open and wild like all other hunting blocks in Zambia. The Game Reserve is in Nyimba District in Eastern Province of Zambia. The Area is along the Luangwa River. Nyamvu Safaris has entered into a Long term project with the Wildlife Authorities to try and develop a Game Reserve for Animals for a period of Ninety Nine years.

The Director of Nyamvu Safaris is Mr. Zaeed Patel. Nyamvu has permanent employees who work throughout the year and are on two year contracts that are renewable. The camp has a resident Professional Hunter and a camp Manager. Other employees include four game trackers, nine anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). We estimate a total of about 113 people to be direct beneficiaries from Nyamvu Safaris employees. These beneficiaries come from the local community.

When Nyamvu Game Reserve was acquired in 2005 the Area was completely depleted such that even seeing an Impala was almost impossible. It had to take frantic efforts by Mr. Zaeed Patel to begin the Anti-Poaching Patrols and then creating water points for animals to access water easily. Slowly the animals started coming back to Nyamvu Game Reserve and as we speak today after 10 years of progressive anti-poaching and creation of suitable conditions for Animals Nyamvu is now home to most of the wild species of Southern Africa including Elephant, Lion and Leopard. The director of Nyamvu has even carried out a restocking exercise of Sable Antelope which originally was not there. We can confirm that Nyamvu now has enough sable that can even be included on Safari Quota to be hunted. The restocking exercise is not only limited to sable only but other species as well.

Among the many efforts done to improve the number of animals in Nyamvu include provision of salt Leaks, provision of Maize Bran, creation of Dams for easy accessibility of water are among the many efforts done to create suitable conditions for Animals to stay in Nyamvu.

We further wish to put it on record that Nyamvu Game reserve is an Area where the director has invested heavily to make it what it is today. The Area was not hunted for about three years from 2005 when it was acquired to about 2008. In all these years the director was merely investing in Anti-poaching patrols, creation of water points among other things to attract game. This is the kind of effort that was invested in this None Fenced Game Reserve to ensure that we have enough stocks of animals.

Safari Hunting was therefore introduced to help with the conservation and income generation for the area and for the help of re-building. In order to make the community benefit from such animals it was agreed that some revenue can be derived from selling these animals on Safari and the revenue can be used to improve the welfare of the surrounding communities.

We can confirm that Schools, Clinics, Bridges, Grave Roads have been built in the surrounding communities of Nyamvu Game Reserve through the revenues raised from Safari Hunting. The chief has equally had a fair share of some benefits through the construction and periodical renovations of the chief's palace and grading of the road which leads to the palace. Nyamvu further purchased Banana Boats that are used by villagers in the community to cross the Luangwa River when trying to access the other side of the River. School Children, Community health workers are among the beneficiaries who use the Banana boat to cross the Luangwa River.

II. ANTI-POACHING COMPONENT

Nyamvu Safaris maintains three groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

Nyamvu Safaris spends about $ 26000 on average per annum to carry out Anti-poaching patrols in the Game Reserve. A total of between 300 and 350 days is recorded per annum. 3000 liters of diesel are used on average per annum which is consumed by 2400 hours of patrol hours. The amount spent on payments for rewards after abducting poachers has been steadily decreasing from 2005 although an average of about 2800 dollars is spent per annum in rewards. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5650	Directly paid and some subsidies to WA
Scout equipment	9450	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	3900	For scouts and WA
Rations for WA and community scouts	3800	
Rewards	2800	For information and arrests
TOTAL	$ 25600	

In the Picture Below two poachers that were apprehended by our Vigilant Scouts.

COMMUNITY PARTICIPATION

A. Community Assistance Component

The agreement that Nyamvu Game Reserve has with the community does not specify what amounts need to be contributed to the community. However on Average, Nyamvu contributes about $ 20000 per annum.

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages.

A hammer mill donated to the community by Nyamvu Safaris

B. Conflict Control

Our problematic animals are mainly the Lions and Elephant. Attached are extracts from the media which confirm Lions attacking Human Beings in Nyimba District of Eastern province where Nyamvu Game Reserve is situated. Management of Nyamvu Safaris has set aside a fund which is used to compensate victims of such unfortunate circumstances. The fund is usually 5000 dollars but can be adjusted depending on the number of such occurrences in a particular year.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $5000 to maintain per annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the Game Reserve by finding water resource. This usually attracts Lion and Leopard to come and hunt in the game Reserve.

V. OTHER INFORMATION

A. Prey Base

Nyamvu Safaris has been monitoring the population growth of the Lion and Leopard which is a result from efforts done so far such as anti-poaching efforts, water provision, and fire management.Nyamvu Safaris will further engage the wildlife Authorities in Monitoring the resources on the ground by position cameras in strategic Areas so as to monitor the Activities of the Lion and Leopard.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lon in our Area. As at now we use Lion tracks and foot prints. Sightings by individuals and just the a few cameras which we use to monitor the size and age for Lion and Leopard when Hunting.

C. Elephant Hunting

Our area is endowed with some very good Elephant hunting and due to the long term conservation plan produces good quality tusks now of between 50 and 60 pounds. Our well-coordinated anti-poaching system has made poaching of Elephant in Nyamvu very difficult. The community has also assisted management at Nyamvu by bringing reports of members of the community that have links with suspected poachers and stringent measures have been taking which include imprisonment for those that were found guilty of poaching. Through our various anti–poaching awareness programs with the community we have managed to make the community assist to guard this natural resource jealously. Nyamvu Safaris maintains a policy of not taking any Elephant whose tusks are weighing 20 kilograms and below.

E. Lion Aging Approach

We use the Lion aging approach when conducting Safari Hunting for Lion. Earlier on we mentioned of Human Animal conflicts mainly with Lions. This can be managed by removing the older Lions in the system through Safari Hunting. It has always been a Policy for Nyamvu Safaris not to harvests any Lions or Leopard which are not old enough to have outlived their useful life. In view of this approach not more than five Lions have been taken in Nyamvu game Reserve from the time Safari Hunting was introduced.

F. U.S. Hunters

It is of no doubt that this is the most sought after market with regards to Safari Hunting in Zambia. Nyamvu Safaris has had a number of clients donating equipment and in some instances funds for Anti –poaching programs. This can confirm to you that these hunters are not only after fulfilling their interests but to also allow the community to benefit through a conservative based approach to Safari Hunting.

CONCLUSION

Nyamvu Safaris can proudly confirm that the project which it started in 2005 has been a success looking at the way the numbers of wildlife has increased in our game reserve. We recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: _____

Operator Name: Zaeed Patel

Title: Director

MOPANE SAFARIS, LTD.
Address, 515 FRANCISTOWN ROAD LIVINGSTONE
Operator email: karimtd@yahoo.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Mopane Safaris, Ltd. has been operating in Luembe-West Petauke Concession since April 2015. The concession provides habitat for a range of species including lion, kudu, leopard, buffalo, and elephant. The concession is in Eastern Province of Zambia. The Area is along the Luangwa River and is about 3227 square kilo meters in connection and conjunction with Nyamu Game Reserve our other area. The Area is classified as Secondary Hunting Area. Mopane Safaris has entered into a Ten Year Lease agreement with the wildlife Authority and is renewable subject to conducting successful conservation records of the Ecological system.

Our company is a Limited Company whose Directors are Mr. Saeed Omar Abdul Karim and Mr. Chishimba Mumba. This concession was acquired in April 2015. In view of this Mopane Safaris has one resident Professional Hunter who also provides the functions and duties of a Camp Manager. Other employees include, four game trackers, twelve anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). We estimate a total of about 215 people to be direct beneficiaries from Mopane Safaris employees. These beneficiaries come from the local community.

We very much welcome the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy School necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from Hunting of Cats and Elephant. With this in mind Mopane Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti–poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mopane Safaris maintains four groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

Fig I. Director and Resident Professional Hunter of Mopane Safaris Mr.Karim (Center) planning the Anti-Poaching Patrols with a wildlife officer and a member from the community.

Fig ii. In the Picture below some Ivory Tusks recovered from Poachers and weapons used for poaching.

In 2015, Mopane Safaris spent almost $ 30900 in Luembe-West Petauke Consession on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 1450 liters of diesel for patrol vehicles. We recorded 328 patrol days and well above 1968 patrol hours. We also made over $ 2005 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	11900	Directly paid and some subsidies to WA
Scout equipment	12450	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	1885	For scouts and WA
Rations for WA and community scouts	7800	
Rewards	2005	For information and arrests
TOTAL	$ 36040	

The concession agreement has a clause which requires Mopane Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2025 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $ 25900 annually as per agreement which was entered into 2015 by Mopane Safaris, the Community and the Wildlife Authorities.

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages. In 2015 the value was $ 24371.

Fig iii. Resident Professional Hunter and Director attending a community Meeting.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers and Human Animal conflict from Lions. $ 12000 has been set aside for compensation purposes when we have such occurrences. In 2015 we paid $ 1000 in compensation to maize fields that were damaged by Elephants to grain fields for Villagers. We further compensated a family whose member was attacked and killed by an Elephant and was one of our Village Scouts who had gone out of camp and on returning to camp the incident occurred. The total cost for compensation and funeral arrangements was $ 2500

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $5000 to maintain in 2015 and 2016 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource. The concession is along the Luangwa River and this makes it have smaller streams flowing in the concession creating more water points for animals. As a result we have a lot of Game in our concession which attracts Lion, Elephant and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mopane Safaris in Luembe-West Petauke is still monitoring the population growth of the Lion, Leopard, Elephant and other species which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mopane Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by position cameras in strategic Areas so as to monitor the Activities of the Game and Cats. Luembe is a secondary Area and as such we have applied more concerted efforts aimed at mitigating the impact of poaching that had characterized the Area for the years when we were not operating in the Area.

We also engaged the wildlife authorities to regulate resident Hunting by proposing that resident Hunting be temporarily stopped for five years so as to give room for animals to breed so as to improve the numbers in the Eco system in Luembe Game Management Area.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lon in our Area. As at now we use Lion tracks and foot prints. Sightings by individuals and just the a few cameras which we used this year to monitor the size and age for Lion and Leopard.

C. Lion Aging Approach

Like other Safari Companies we have been following an age-based policy for African lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities, and to be conservative in estimating age.

A number of potential Lion Trophy were not hunted this year because of our company policy and selectiveness.

Our approach as a company from 2015 until 2025 when our concession will be due for renewal is to hunt Lion which has reached an advanced and mature age only of 6 years and above.

D. Elephant

Elephant Hunting in Luembe is also one of the High Income earners. Mopane Safaris is alive to the fact that Ivory is of high value on the world market and is on high demand in particular the Far East. Mopane Safaris therefore has put up a robust Anti-Poaching program to protect this rare species. In view of this we have a policy as company not to harvest any Elephant with Tusks weighing below 20 kilograms. We recognize the fact that it may be difficult to judge but we expect the Professional Hunters to exercise caution and use their judgment before allowing a client to hunt one. Professional Hunters have been given an allowable allowance of 1 kg so as not to go below the recommended threshold by the wildlife authorities of 15 Kilograms as a minimum shoot able size Elephant.

E. U.S. Hunters

Most of our clients are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching of our community compensation fund or community assistance programs.

CONCLUSION

Mopane Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion, Leopard and Elephant and we recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: _____

Operator Name: Saeed Karim

Title: Director

RE: Zambian Operators Enhancement Report Summary

INTRODUCTION

This is a summary report of the individual "Operator Enhancement Reports" provided by four Zambian hunting operators. The reports detail the individual operator's anti-poaching, community investment, habitat protection, animal conflict control, and other important information. This report compiles that data to ensure the confidential of the sources for commercial competition purposes.

The reports were provided by a sample of four Zambian safaris operators. They manage four hunting areas covering 10,028 km^2. The anti-poaching, community development, and other figures explained in this summary report far under represent the full benefits provided by hunting operators in Zambia.

ANTI-POACHING

All four operators deploy anti-poaching units in their concessions. Anti-poaching operations are conducted year-round and teams are deployed several times per month. The teams range from three to five members. Of the three operators reporting, at least 991 anti-poaching days were conducted in 2015 (2.71 years of anti-poaching patrols). The operators provide fuel and rations to government and community scouts and coordinate with these scouts to ensure complete coverage. Moreover, the operators keep their anti-poaching teams motivated by providing them with rewards for contraband seizures and poacher arrests.

Two of the four companies keep records of poacher arrests and seizures. In 2015, one operator recorded 94 snares collected, and 28 muzzleloaders and seven shotguns confiscated. In 2016, another operator recorded over 1,000 snares and 40 gin traps collected, 10 poachers arrested, and three bicycles, five muzzleloaders, and 14 miscellaneous weapons confiscated.

Operators fund their anti-poaching through their hunting revenues and secondarily from client contributions. Anti-poaching expenses reported by the operators include: vehicle fuel, rations, salaries, clothing, vehicle repair, phones, tents, support to Wildlife Authority, and rewards. In 2015 alone, the four operators spent $201,900 on anti-poaching. None of the operators reported any serious habitat related destruction.

COMMUNITY DEVELOPMENT & OTHER SOURCES OF COMMUNITY EMPOWERMENT AND ASSISTANCE

The four operators provide assistance in the form of direct and ancillary support to the communities. Doing so incentivizes the communities to protect wildlife and not retaliate in instances of human-wildlife conflict.

In 2015, the operators contributed $99,900 to the villages located in their hunting areas. These contributions took the form of school renovations, village government infrastructure support, funding youth sports league, paying teacher salaries, sponsoring school fees for

impoverished children, digging new boreholes and providing pump stations, funding transportation for children to attend school, and medical support to the communities, among other things.

Protein malnutrition is a serious threat faced by many rural Zambians. Furthermore, bushmeat poaching is indiscriminate and damaging especially on prey base species. To combat both protein malnutrition and indiscriminate bushmeat poaching, all four operators donate legally harvested meat to the communities. On average, the four operators report donating 55% of the annually harvested animals to the communities. Two of the four operators report the value of the game meat donated to the villages being $51,871 in 2015.

The operators also support the communities by providing full-time and part-time employment. The four operators report hiring full-time employment of 89 camp staff and 71 anti-poaching scouts. The full-time employees are sourced from the local communities, thus extending the benefits to dependents. The operators report 1,128 community members being dependent on the employment provided by the operators. Lastly, one operator reports hiring 130 additional community members for temporary employment each year.

ADDITIONAL INFORMATION

HABITAT PROTECTION

Three of the four operators report providing water infrastructure for the exclusive use of wildlife in their hunting areas. The habitat set aside for hunting is crucial for lion conservation as it would otherwise be at the disposal of communities for agricultural and livestock use.

WILDLIFE CONFLICT CONTROL

All four operators have a conflict control program in place with the communities. Communities are trained and provided with equipment to deal with crop raiding wildlife in a non-harmful manner. All of the operators also have funds to compensate villagers for lost crops, injured or killed family members as a result of wildlife, and lost livestock.

OTHER LION ENHANCEMENT INFORMATION

All four operators report monitoring lion. The most common form is compiling pictures from trail cameras of lion on bait and entering lion sightings and tracks onto GPS. Information is transmitted between the company and the Wildlife Authority. By using trail cameras, the operators can identify and more accurately age male lion to ensure they comply with new aging regulations.

CONCLUSION

The sampled Zambian hunting operators provide lion enhancement by addressing the three primary threats to lion survival: loss of prey base, loss of habitat, and human lion conflict.

In 2015 alone, the four operators invested $201,900 on anti-poaching. Anti-poaching directly combats loss of prey base by apprehending poachers, monitoring the concessions, and collecting indiscriminate snares and gin traps.

Community development plays an essential role in incentivizing the communities in protecting the wildlife and habitat. The operators compensate the communities in various ways. In 2015, the four operators contributed $90,900 directly to the communities. Furthermore, the operators provide an essential source of full time and temporary employment as well as game meat donations to dissuade poaching and provide essential protein.

In short, the attached reports demonstrate that licensed, regulated hunting in Zambia enhances the survival of lion in the wild.

Operators Reporting:

- Kwalata Safaris, Ltd.
- Mopane Safaris, Ltd.
- Muchinga Adventures, Ltd.
- Nyamvu Safaris, Ltd.

Vargas, Darcy <darcy_vargas@fws.gov>

Lion Trophy Import application # 84930C

Vargas, Darcy <darcy_vargas@fws.gov> Wed, May 22, 2019 at 1:39 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Conservation Force,

Ref: Application # 84930C; Samuel James Cunningham's lion import application request.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. The referenced application is requesting the import of a lion, to be taken in Zambia between September to October of 2019. However, the location of address of whom would be shipping the lion to Mr. Cunningham is in East Cape South Africa. Therefore, in order for us to consider authorizing the import of a lion trophy from South Africa, we must be provided with a copy of the Zambian CITES permit that will authorize the export of the lion trophy from Zambia to South Africa.

2. Please clarify why the trophy is being exported from Zambia to South Africa, before being requested for import into the United States.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office **by June 6, 2019**, (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Application no. 84930C (specific date of hunt?)

Brisendine, Amy <amy_brisendine@fws.gov>

Tue 4/7/2020 1:04 PM

To: cf@conservationforce.org <cf@conservationforce.org>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>; (b)(6) scunningham@quailcreekent.com>

Dear Mr. Cunningham,

I apologize for the delay in processing your application to import a trophy of a lion that was hunted in Zambia (application no. 84930C, received in our office on 3/27/2018). Can you please provide me with the specific date the lion was hunted/taken?

Thank you and please contact me if have any questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

Fw: [EXTERNAL] RE: Application # 84930C - S. Cunningham

Brisendine, Amy <amy_brisendine@fws.gov>
Wed 4/15/2020 7:03 AM
To: Whitley, Stephanie D <stephanie_whitley@fws.gov>

Hi Stephanie,

Could you upload this to the SPITS library for me?

Thank you so much!!

Amy
****

From: Werner Van Noordwyk <werner@vannoordwyksafaris.com>
Sent: Wednesday, April 15, 2020 2:50 AM
To: 'Tammy Piker' <permits@conserva onforce.org>; scunningham@quailcreekent.com <scunningham@quailcreekent.com>; 'John Jackson, III' <jjjiii@a .net>; Brisendine, Amy <amy_brisendine@fws.gov>
Subject: [EXTERNAL] RE: Applica on # 84930C - S. Cunningham

Good Day Tammy.

Thank you for copying me in the correspondence.

Sam did not come on the hunt and I doubt is planning this original planned safari in Zambia soon.

But please just make sure to get the final answer back from Sam before you all do anything.

Best Regards
Werner.

Werner van Noordwyk
Postnet Suite 98
Private Bag X 504
Sinoville, Pretoria
South Africa
0129

Web www.vannoordwyksafaris.com
Tel : + 27 824927362
Sat : + 88 21621156978

From: Tammy Piker [mailto:permits@conservaon force.org]
Sent: Tuesday, 14 April 2020 11:59 PM
To (b)(6) ohn Jackson, III <jjjiii@a.ne t>; amy_brisendine@fws.gov; werner@vannoordwyksafaris.com
Subject: Applicaon # 84930C - S. Cunningham

Mr. Cunningham,
Mr. Jackson asked me to follow up with you after he saw your response to the FWS that you had cancelled your trip to Zambia for a lion hunt.
He wanted to inquire if you did not go on the hunt because you did not have an import permit? Are you planning to reschedule your trip, in which case we may be able to amend your application?
If you do not plan to reschedule a trip, do we have your permission to withdraw this import permit application?
Please, let us know if you have any questions or we can assist you with anything else.
Thank you

Aimee Korver
Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200
Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

Virus-free. www.avast.com

[EXTERNAL] Re: Application no. 84930C (specific date of hunt?)

Aimee Korver <permits@conservationforce.org>
Wed 4/22/2020 11:14 AM
To: John Jackson <jjjiii@att.net>; Brisendine, Amy <amy_brisendine@fws.gov>

Ms. Brisendine,

Mr. Cunningham would like to withdraw his permit application # 84930C. He will not be rescheduling his trip in the next year.

Thank you and please let me know if you have any further questions.

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

> Ms Brisendine,
> Thanks for your email. I never hunted lion in Zambia. I was scheduled to do so but ended up canceling that trip.
> Thank you.
> Sam Cunningham.
>
> Sent from my iPhone
>
> > On Apr 7, 2020, at 12:04 PM, Brisendine, Amy <amy_brisendine@fws.gov> wrote:
> >
> > Dear Mr. Cunningham,
> >
> > I apologize for the delay in processing your application to import a trophy of a lion that was hunted in Zambia (application no. 84930C, received in our office on 3/27/2018). Can you please provide me with the specific date the lion was hunted/taken?

Thank you and please contact me if have any questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike,MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.or <g" rel="noopener" target="_blank" data-mce-href="https://www.cites.org/eng/disc/how.php>g">https://www.cites.org/eng/disc/how.php>g

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

NOV 17 2017

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
AyL	DAVid	GEORGE	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; include name of contact person if applicable; include room or apartment #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
ARLINGTON Hts	IL	60004	USA COOK	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 08US148918/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature of individual responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 10-23-17

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   AFRICAN LION
   b. Sex (if known). MALE

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
   b. Date wildlife is to be hunted:
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
   ZAMBIA - EASTERN PROVINCE MWANZA GMA NEAREST CITY IS MFUWE GIS COORDINATES 36L 0397901 UTM 8589200
   b. Date wildlife was hunted: 10-5-17

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
SKIN SKULL LIFE SIZE MOUNT

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
MVH SAFARIS
PLOT NUMBER 6980 KATANGA ROAD
HEAVY INDUSTRIAL AREA LUSAKA-ZAMBIA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: MVH SAFARIS
Business Name: MVH SAFARIS ZAMBIA LIMITED
Address: P.O. BOX 35225 LUSAKA
Address: 6980 KATANGA ROAD
City: LUSAKA
State/Province: LUSAKA
Country, Postal Code: 10101

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: (b)(6) Date: 10-23-17

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

DAVID C. AUL [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Vargas, Darcy <darcy_vargas@fws.gov>

64271C / import of lion trophy

David Aul (b) (6) Mon, Jun 11, 2018 at 12:35 PM
To: darcy_vargas@fws.gov
Cc: (b) (6)

Ref: 62471C

Ms. Vargas,

My father, David G. Aul, has asked me to assist him with getting you the informaon y ou have requested. A. ached are the hunng permit and license documen ts you requested. The hunt was conducted in a GMA. My father's lion is listed on line #2 on the aging report (Client "DAG" should be DGA). The professional hunter ("PH") who guided on his trip, Jason Stone, said that this report also incorrectly lists a different PH (see attached text message).

Please let me know if you require any addional in formaon.

Sincerely,

David J. Aul

From: (b) (6)]
Sent: Thursday, June 07, 2018 3:34 PM
To: (b) (6)
Subject: Fwd: [EXTERNAL] Re: 64271C / import of lion trophy

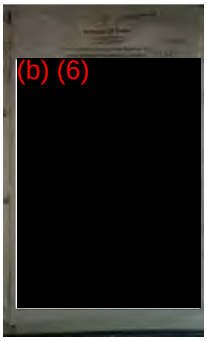
-----Original Message-----
From: Vargas, Darcy <darcy_vargas@fws.gov>
To: ahvets (b) (6)

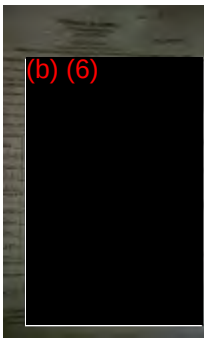
[Quoted text hidden]

[Quoted text hidden]

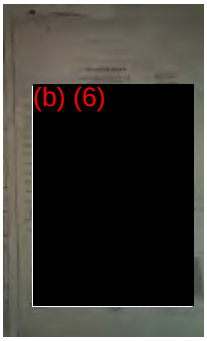
5 attachments

hunting license - lion.jpg
121K

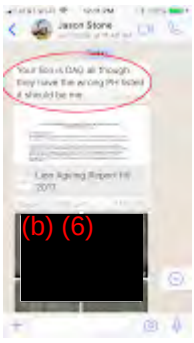




hunting license - record of animals harvested.jpg
141K



permit to hunt in GMA.jpg
111K



text msg from Jason Stone.PNG
485K

Lion Ageing Report for 2017.pdf
1150K

PERMIT / CERTIFICATE No.

REPUBLIC OF ZAMBIA

The Zambia wildlife Act
(Act No . 12 0f 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

NON RESIDENT HUNTING LICENCE 22324

(Regulation 3 (2)

Station of issue: Chilanga Date of issue: 04-10-2017

DETAILS OF LICENSEE

Full Name: Mr. David George NRC/Passport No:

Nationality: USA Tel/Fax:

Addrsss:

Full Name of Safari company: Divu Safaris

Co any Cert. Incorporation No: Date of incorporation:

Postal Address: Box 35225 Lsk

Residential Address:

Firearm Licence/Tourist's Firearm import No: Caibre of Firearm(s):

Type of Hunt: Hunting Block:

The above named Safari company and its bona fide Clients are authorised by this licence under the Guidance of a Professional hunter to hunt the follwing Game or Protected animals within the Game Management Area or hunting block Specified hereunder and for the specified period and upon payment of the fees specified below

Species of animal	Number	Sex	Hunting Area	Hunting Period	Fees US$
1) Lion	1st	M	Musanya	2017	$ 4 200 -

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
04 OCT 2017
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.
6956

Total Animals Fees	$ 4,200
Concession Fees	—
Grand TOTAL	$ 4,200

Note:

Original copy to be retained by the Licencee

Duplicate copy to be forwarded to the Director - General or to an agent

Triplicate to be retained in the book

Date: 04-10-17

Director General

CONVENTION ON

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 12 OF 1998)

24993

FORM ZAWA 7

THE ZAMBIA WILDLIFE
(LICENSES AND FEES) REGULATIONS, 2007

PERMIT TO HUNT IN A GAME MANAGEMENT AREA
(Regulation 4)

Station of issue Chilanga Date of issue 19/9/17

1. DETAILS OF PERMIT HOLDER

Full name Aul David George NRC/Passport No (b) (6)

Postal Address: (b) (6) (Muyaya)

Residential Address: USA

Firearm License No(s) Company Firearms

Calibre(s) 375

Resident Hunting Licence - National/District (Nos.)

Bird Hunting Licence No Game

Is hereby authorised to hunt in Lumimba Hunting block

Management Area, Muyaya

For 19 days from 20/9/17 to 10/10/17 (dates inclusive)

Fees Paid K $1650 Receipt No

Date 19/9/17

Director General-ZAWA

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
PRIVATE BAG 1, CHILANGA, ZAMBIA.
19 SEP 2017
LICENSING

Conditions of issue

1. Not more than three (3) persons may accompany the permit holder into the Game Management Area.
2. No firearms, other than those endorsed on this Permit may be brought into the Game Management.

White copy to the Permit holder
Yellow copy to Director General
Blue copy to be retained in the book

Delux Printers Ltd. 01-221709

SUMMARY REPORT ON AGING OF THE 2017 HUNTED LIONS.
BY DNPW Research Unit.

1.0 BACKGROUND

The Department of National Parks and Wildlife in 2017 issued a lion sport hunting quota of 34 animals. Out of the 34, a total of 21 were successfully harvested from 15 Hunting blocks.

Measurements and photos from Professional Hunters were submitted to three different independent assessors while DNPW also did its own assessment. Thereafter a meeting was held by the Ad hoc Aging Committee that finalised the age category of each lion hunted. Below are observations and recommendations as discussed during the aging committee meeting held on 17th May 2018 at Chilanga and results of the aging process presented in the attached table.

2.0 OBSERVATIONS AND RECOMMENDATIONS

Further to the aging process, a few concerns and observations were made by the assessors and the aging committee.

1st Observation : Poor and fewer photos taken than required. Some professional hunters did not take all the required 10 (6 Field and 4 skull) photos and from the positions as indicated in the guidelines, while some were taken of dirty and bloody animals. This made aging difficult.

Recommended Actions:

(I) More photographs should be taken right after the hunt with the nose and muzzle and teeth in particular should be clean of dirt and blood. These would significantly help with aging as often the nose is dirty and muzzle and teeth often bloody or in bad light. Better pictures would be essential for some of these lions.

(II) PHs need to photograph the whisker-spot patterns (side of face on each side) better in order to better age them with known age-animals.

2nd Observation: Incomplete submission of return forms. Some parts of the return form where not completed while some PHs did not submit the trophies for measurement intime;

Recommended Actions:

(I) DNPW will not accept incomplete submissions therefore will not process export permits or PH licences until complete returns are submitted;

(II) All submissions of return forms and field photos should be made directly by PH or outfitter representative to DNPW and signed for but not through third parties like a taxidermy company.

3rd Observation: Late submission of return forms. The hunting guidelines require that trophies and completed return forms are submitted within two months of the hunt. This consequently, affected processing of aging and consequently processing of professional hunter's license and export permits.

Recommended Actions:

(1) DNPW to fine and caution PHs for late submission;

(II) No professional hunter's license will be renewed for repeat offenders;

(III) Export permits will only be processed upon payment of fine and submission of complete returns form and trophy.

4th Observation: Mixing up of Photos. Some PHs who hunted more than one lion sent photos of different lions in one folder. This made it difficult to tell one animal from the other thus affected aging.

Recommended Actions:

(I) All photos should be submitted as JPEG in one folder for each lion hunted and properly labelled using the naming format: GMA_Hunting Block_PH's last name. For example, if a PH by the name of Jeff Banda hunted two lions in Mwanya, the folder should be called "Lumimba_Mwanya_Banda1" and the second lion's folder "Lumimba_Mwanya_Banda2".

(II) Figure 1 photo of whole body from side should include PH in photo for identification.

(III) Capture trophy's label must be captured in the photo

5th Observation: Age of hunted lions: From the estimates of the 2017 trophies assessed, the youngest lion was Munyamadzi Game Ranch and Sandwe while the oldest was in Mukungule. There were no subadult lions/young adult or female lions taken, and no extremely old lions taken apart from Mukungule who was judged to be at least about 8yrs.

Recommended Actions:

No further action but to congratulate most PHs for sticking to the hunting guidelines on age and especially Boabab Safaris for harvesting the oldest lion in 2017. DNPW further encourages PHs to increase their hunting effort and use camera traps to improve on filed identification of lions

6th Observation: Average age of Hunted lions and Quota: The majority of lions taken in 2017 assessed here all within the 5-6 year old range. While this may be acceptable given a 5-year old minimum but it is not ideal not sustainable over time.

Recommended Actions: We would highly recommend that the allocated quotas not exceed 1 lion/hunting block/year, as was discussed when lion hunting was reopened in 2016. This will help to ensure trophy quality as well as maintain sustainability of lion hunting in years to come. People will never be able to find truly old lions if they are shooting them as 5-6 year olds every year.

Table showing results of aging for lions hunted in 2017 and one in 2016

S/N	Hunting Block	Client	Name of PH	ASSESOR				Final Age Category	Comments
				A	B	C	D		
1	Lumimba Mwanya	RA	Jason Stone	5-6	4>5,5	5-6	5-6	II	
2	Lumimba Mwanya	DAG	Van Noordwyk	5-6		5-6	6-7	II	Name of Professional Hunter (PH) on this line incorrect. It should be Jason Stone. See attached text msg.
3	Lumimba Nyaminga	LM	Ross Heath	NA	NA	NA	NA	Not Aged	Did not hunt lion in 2017
4	Lunga Luswishi_Kasempa	TA	Bell-Cross	6	5,5>6	5-6	5-6	II	Neck Snare Mark behind ears?? Mane growing up & back on forehead (but may have lost mane anterior of snare mark), Heavy facial scarring looks fresh; Snare wear on ULCanine; skull appears wide
5	Lupande_Upper	SSFBR	Leon Kachfihoffer	7-9, >7	5-6	≥7	5-6	I	Absent/lost (in life) UL PM4 may have caused asym tooth wear, but real wear is still apparent and hvy. Lion age known at 8yrs
6	Lupande-Lower	LRB	Buske	5-6, 6	6-7	≥7	5-6	II	
7	Lupande-Lower	WK	Van Noordwyk	6, 6-7	5-6	5-6	5-6	II	
8	Mukungule	RFD	Swanepoel	8-10, >8	≥7	≥7	7-8	I	UL Canine & LR Canine broken but well smoothed; all teeth show heavy wear. Good pics

19	Sandwe	LG	Valerio Ventriglia	5-6, 6, 6-7	5-6	4-5	4-5	II,III	insufficient trophy photos (no tooth color, no full body); trophy photo appears to show snare injury to RH foot, severe underbite would influence tooth wear esp Inc,
20	OGR Munyamadzi	MPz	Thor Kichner	5, 5-6	5-6	4-5	5-6	II	Snare damage to both U Canines (more on left)
21	OGR NYAMVU	DRW	Van Noordwyk	5-6, 6, >7	6-7	5-6	5-6	II	Both U Canines damaged, UR appears slightly smoothed at tip while UL unclear when damage occurred
22	Musalangu_Chikwa West	JTA	Jeff Rann	NA	NA	NA	NA	II	this was 2016 Hunted lion, ver late submission

Submitted

Jones Kiwala Masonde
PRINCIPAL ECOLOGIST-RESEARCH

CONVENTION ON

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 12 OF 1998)

24993

FORM ZAWA 7

THE ZAMBIA WILDLIFE
(LICENSES AND FEES) REGULATIONS, 2007

PERMIT TO HUNT IN A GAME MANAGEMENT AREA
(Regulation 4)

Station of issue Chilanga Date of issue 19/9/17

1. DETAILS OF PERMIT HOLDER

Full name Aul David George NRC/Passport (b) (6)

Postal Address: (b) (6) (Mwanya)

Residential Address: USA

Firearm License No(s) Company Firearms

Calibre(s) 375

Resident Hunting Licence - National/District (Nos.)

Bird Hunting Licence No. Game

Is hereby authorised to hunt in Lumimba Hunting block

Management Area, Mwanya (dates inclusive)

For 15 days from 20/9/17 to 10/10/17

Fees Paid K #1650 Receipt No.

Date 19/9/17

Director General-ZAWA

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
PRIVATE BAG 1 CHILANGA, ZAMBIA.
19 SEP 2017
LICENSING

Conditions of issue

1. Not more than three (3) persons may accompany the permit holder into the Game Management Area.
2. No firearms, other than those endorsed on this Permit may be brought into the Game Management.

White copy to the Permit holder
Yellow copy to Director General
Blue copy to be retained in the book

Delux Printers Ltd. 01-221709

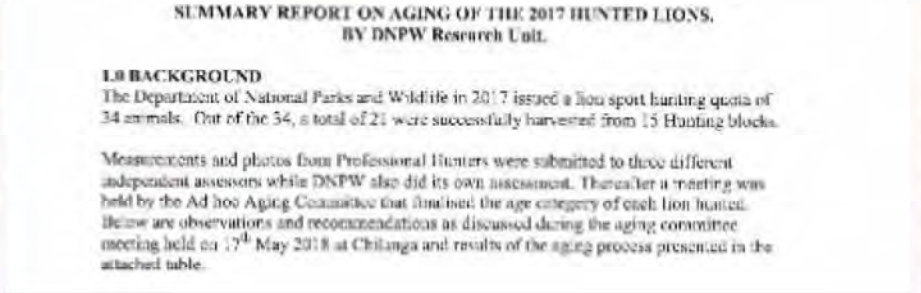
Jason Stone

;een today at 11:49 AM

Today

Your lion is DAG all though they have the wrong PH listed it should be me.

11:01 AM



SUMMARY REPORT ON AGING OF THE 2017 HUNTED LIONS.
BY DNPW Research Unit.

1.0 BACKGROUND

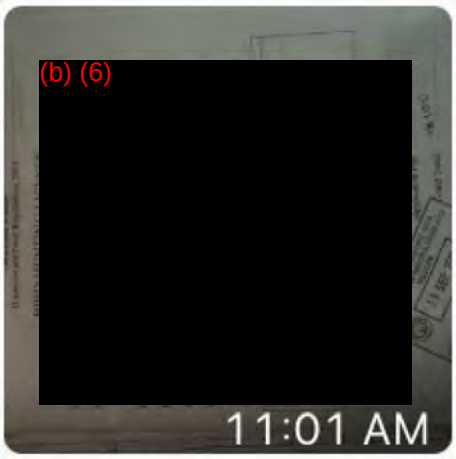
The Department of National Parks and Wildlife in 2017 issued a lion sport hunting quota of 34 animals. Out of the 34, a total of 21 were successfully harvested from 15 Hunting blocks.

Measurements and photos from Professional Hunters were submitted to three different independent assessors while DNPW also did its own assessment. Thereafter a meeting was held by the Ad hoc Aging Committee that finalized the age category of each lion hunted. Below are observations and recommendations as discussed during the aging committee meeting held on 17th May 2018 at Chilanga and results of the aging process presented in the attached table.

pdf

Lion Ageing Report for 2017

4 pages • 1.2 MB • pdf 11:01 AM



United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-64271C

Enhancement Finding
Applicant: David George Aul (PRT-64271C)

David George Aul submitted an application on November 21, 2017, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken October 5, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Aul's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Eastern province Mwanya, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Aul's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Aul's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Aul's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation

guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Aul's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Aul will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Aul, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): <u>The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application</u>:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): <u>Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application</u>:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Aul.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to David** (b) (6) **Aul.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

6/18/18

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita.* 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

LION ZAMBIA ESA TROPHY

Permit Number: MA64271C-0

Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
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FALLS CHURCH VA 22041-3803

Mary Coogans

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

DAVID G AUL
(b) (6) [redacted]
ARLINGTON HEIGHTS, IL 60004
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2017 hunting season.**

D. Trophy must be accompanied by valid hunting authorization ssued by the government of Zambia for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

LB

RCVD NOV 21 2017

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
BURNS	THOMAS	PATRICK	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
AUSTIN	TX	78733	TRAVIS	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 060509031779 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of [redacted] that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature (b)(6) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 11/17/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      P.L. Melanochaita (African Lion)

   b. Sex (if known).
      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
      Zambia Southern Province, Mulobezi, GPS: 16°19'22.18"S; 25°25'28.90"E

   b. Date wildlife was hunted:
      July 7, 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull and floating bones

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
Bangweulu Taxidermy, 4142/K Chifwema Road, New Kasama, Lusaka ZAMBIA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Michael Borman
Business Name:	Bangweulu Taxidermy, LTD.
Address:	4142/K Chifwema Road
Address:	New Kasama
City:	Lusaka
State/Province:	ZAMBIA
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] Date: 11/17/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Greg Brownlee - (b) (6)
Regina Lennox - regina.lennox@conservationforce.org or 504-837-1233

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: [redacted]

Name: THOMAS BURNS

Date: 11/17/17

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 11, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-64280C

Enhancement Finding
Applicant: Thomas Patrick Burns (PRT-64280C)

Thomas Patrick Burns submitted an application on November 21, 2017, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia, for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 7, 2016, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the

prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Burns' application involving a *P. l. melanochaita* sport-hunted trophy taken in the Zambian Southern Province, Mulobezi, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Burns' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Burns', participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Burns' application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Burns' hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Burns' will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Burns' managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): <u>The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application</u>:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): <u>Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application</u>:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Burns.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Thomas** (b) (6) **Burns.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/18/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Creel S, M'soka J, Droge E, Rosenblatt E, Becker M, Matandiko W, and Simpamba T. May 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy, doi: 10.1002/eap.1377.

Dickman A, Johnson PJ, Kesteren FV, and Macdonald DW. 2015. The moral basis for conservation: how is it affected by culture? Frontiers in Ecology and the Environment, 13: 325–331. doi:10.1890/140056

Di Minn, E, Leader-Williams, N, and Brandshaw C JA. 2016. Banning Trophy Hunting will Exacerbate Biodiversity Loss. Trends in Ecology & Evolution, February 2016, Vol. 31, No.2.

Grijalva RM, Natural Resources Committee Democrats. June 2016. Missing the Mark: African trophy hunting fails to show consistent conservation benefits, a report by the Democratic staff of the House Committee on Natural Resources.

IUCN Species Survival Commission, 2012. Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN, April 2016. Informing decisions on trophy hunting; A Briefing Paper for European Union Decision-makers regarding potential plans for restriction of imports of hunting trophies, Briefing Paper / Trophy Hunting and Briefing Paper / Trophy Hunting / Annex – Case Studies.

Lindsey PA, Balme GA, Booth VR, and Midlane N. 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land, PLOS One http://dx.doi.org/10.1371/journal.pone.0029332.

Loveridge AJ, Searle AW, Murindagomo F, and Macdonald DW. 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation, Volume 134, Issue 4, February 2007, Pages 548-558.

Macdonald D. November 2016. Report on lion conservation with particular respect to the issue of trophy hunting, University of Oxford, Conservation Research Unit.

Packer C. 2015. Lions in the Balance: Man-Eaters, Manes and Men with Guns. Chicago University Press.

Miller J RB, Balme G, LindseyPA, Loveridge AJ, Becker MS, Begg C, Brink H, Dolrenry S, Hgirunt JE, Jansson I, Macdonald DW, Mandisodza-Chikerema RL, Cotterill AO, Packer C, Rosengren D, Stratford K, Trinkel M, White PA, Winterbach C, Winterbach H EK, and Funston PJ. 2016. Aging traits and sustainable trophy hunting of African lions, Biological Conservation 201 (2016) p. 160–168.

Simasiku P, Simwanza HI, Tembo G, Bandyopadhyay S, and Pavy J-M. June 2008. The impact of Wildlife Management Policies on Communities and Conservation in Game Management Areas in Zambia; Message to Policy Makers, Natural Resources Consultative Forum.

USFWS (2015). Final ESA listing rule for *Panthera leo leo* and *P. l. melanochaita*. 80 Fed. Reg. 79999.

Zambia Department of National Parks and Wildlife (DNPW). May, 5th, 2016. Enhancement and Non-Detriment Finding for African Lion sport Hunting in Zambia Completed by the Department of National P Parks and Wildlife (DNPW).

Permit Number: MA64280C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coogliano

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

THOMAS PATRICK BURNS
(b) (6) [redacted]
AUSTIN, TX 78733
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zambia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD OCT 11 2017

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
CHAO	RANDAL		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b)(6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b)(6)			(b)(6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
WILMETTE	IL	60091	COOK	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable*** ***le 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my ... ...y false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature (... ...le for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 10/5/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      PANTHERA LEO, two captive breed african lions (one male and one female) from south africa

   b. Sex (if known).

      ONE MALE AND ONE FEMALE

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      SOUTH AFRICA, FREE STATE PROVINCE

   b. Date wildlife was hunted:

      1/19/2016-1/20/2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

ONE FULL MOUNT, SKULL, FLOATING BONE
ONE RUG, SKULL, FLOATING BONE

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

SANDRA LINDE TAXIDERMY, P.O. BOX 764, FRANKFORT, 9830, SOUTH AFRICA
+2782 378 3307 INFO@SANDRALINDETAXIDERMY.CO.ZA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	MADELEINE VENTER
Business Name:	SANDRA LINDE TAXIDERMY
Address:	P.O. BOX 764
Address:	
City:	FRANKFORT, 9830
State/Province:	SOUTH AFRICA
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applic[redacted]y, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 10/5/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
RANDAL CHAO, (b)(6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-58309C

November 13, 2017

Mr. Randal Chao
(b)(6) [redacted]
Wilmette, Illinois 60091

Dear Mr. Chao:

This letter responds to your October 5, 2017, application requesting a permit under the U.S. Endangered Species Act (Act) to import a sport-hunted lion (*Panthera leo melanochaita*) hunted in the Free State Province, South Africa. After careful review and consideration of your application, your request is being denied for the reasons described below.

The subspecies of lion found in Southern Africa (*P. leo melanochaita*) is listed as threatened under the Act with a rule under section 4(d) of the Act, which is set forth at 50 CFR 17.40(r)[1]. Section 9 of the Act[2] and our implementing regulations at 50 CFR 17.31 set forth a series of general prohibitions that apply to all threatened wildlife, respectively, except where there is a 4(d) rule, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Otherwise prohibited activities, such as imports, may be permitted, but only if the U.S. Fish and Wildlife Service (Service) finds that the activity is consistent with the 4(d) rule and the purpose of the Act [Section 10(d)[2]]. The primary purpose of the Act is the conservation and continued existence of wild populations of endangered and threatened species and the ecosystem on which they depend (Section 2[2]). It is the requirement of the Act and its implementing regulations (50 CFR 17.31(a)(2)[1]) that the proposed

[1] The text of this regulation is available at: http://go.usa.gov/xr6m3
[2] The text of the Act is available at: http://go.usa.gov/xr6dd

activities of the applicant would enhance the propagation or survival of the subspecies by reducing the threat of extinction in the wild or otherwise benefits the species in the wild.

While the threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits, it does not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of captive-bred lion hunting trophies. Therefore, when making a determination of whether the importation of such a trophy would enhance the propagation or survival of *P. l. melanochaita,* the Service examined the overall management of the captive subspecies in South Africa and whether that management addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we evaluate whether the import contributes to the overall conservation of the subspecies in wild by addressing loss of habitat, loss of prey base and human-lion conflicts, the basis for listing the subspecies as threatened under the Act.

Since the subspecies was listed under the Act, the Service has had discussions with South African Department of Environmental Affairs and the South Africa Predator Association (SAPA). However, the Service has not receive any specific information about how the management and subsequent hunting of captive lions contributes to the species in the wild. While the 2015 Biodiversity Management Plan for the Lion (Panthera leo) in South Africa (BMP), the lion management plan for the country, has some discussion on captive lions within South Africa, it does not include any discussion of how captive lions are contributing to the long-term conservation of lions in the wild. The brief overview of activities being conducted or proposed to be conducted by SAPA, received on August 26, 2016, and further discussion on September 28, 2016, provided some additional discussion of how captive lions could potentially contribute to wild lion conservation, it primarily addressed activities and support that could be started in the future or activities that, while generally contributing to South Africa's overall economy, do not contribute directly or indirectly to conservation efforts for *P. l. melanochaita.* Further, of over 200 farms/ranches that maintain captive-bred lions, SAPA only identified 9 that were accredited under their standards for hunting, which would be the only facilities that might contribute to SAPA activities.

According to the BMP, captive lions in South Africa are primarily held and bred in private facilities under the governance of individual South African provinces. The BMP points to a prevailing view amongst carnivore specialists that captive-bred lions do not contribute to the conservation of the species, particularly given that inbreeding is known to occur with captive lions. This could compromise genetic integrity and provenance and therefore not make these lions suitable for reintroduction purposes. Further, based on the limited information currently available, there is no evidence to suggest that captive breeding operations are supporting or contributing to any in-situ conservation efforts for wild lions. Given the level of management and oversight that is afforded wild and wild-managed lions, the claim that has been voiced by some that utilizing captive lions as trophy animals reduces the demand on wild lions is not demonstrated to be accurate based on available information.

The decision to issue or deny an application to import a captive-bred lion trophy is made on a case-by-case evaluation of the submitted application. As such, we would need to evaluate each

application individually to determine if the information provided by the applicant would enable the Service to find that a permit for the importation of sport-hunted trophies of captive-bred lions (*P. l. melanochaita*) taken in South Africa during the 2016 calendar year meets the enhancement criteria under 50 CFR 17.32. However, based on the currently available information, and the information you provided in your application, your proposed import does not appear to meet the purposes of the Act or the issuance criteria in 50 CFR 17.32(a)(2).

Therefore, there is no indication that permitting the import of trophies of captive-bred lions sport-hunted in South Africa in 2016 would enhance the propagation or survival of the species in the wild. Without additional information that would enable the Service to make such a finding in accordance with the general considerations laid out above, the Service is unable to make a determination that the import of captive-bred lions would meet the issuance criteria under 50 CFR 17.32. Therefore, until such time as additional information becomes available that would affect this finding, the Service **is unable to authorize the import of captive-bred lion trophies from South Africa**. Please see attached October 19, 2016, enhancement finding for additional information.

As provided in 50 CFR 13.29 (a)[3], you may request reconsideration of our decision to deny your application. Such a request must be submitted in writing with the original signature of the person requesting reconsideration or by that person's legal representative, must contain a certification statement as provided at 50 CFR 13.12(a)(5)[1] should refer to your file number, PRT-58309C, and must be received in this office within 45 calendar days of the date of this letter. The reconsideration of the decision to deny your request will be based on the information you provided in your original application. As such, your letter requesting reconsideration must address how our decision to deny your application was based on a misinterpretation of the information provided in your applications, or it must present clarification of this information. **Should you supply new information that changes the content of your original application, a new application will need to be submitted to this office before such information can be considered.**

If you have any questions, please contact Biologist Caroline Harlow of this office: Division of Management Authority, Branch of Permits, MS: IA, 5275 Leesburg Pike, Falls Church, Virginia 22041-3803 (1-800-358-2104, ext. 2296 or 703-358-2296).

Sincerely,

Timothy J. Van Norman, Chief
Branch of Permits
Division of Management Authority

[3] The text of this regulation is available at: http://go.usa.gov/xYDUk

240 Westmoreland Dr
(b) (6)

November 20, 2017

NOV 2 8 2017

In Reply Refer To:
FWS/AIA/DMA/PRT-58309C

Fish and Wildlife Service
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

Dear Sir,

This letter responds to your decision of denial for my permit application to import sport-hunted lions (Panthera leo melanochaita) hunted in the Free State Province South Africa on Jan 19-20, 2016.

The primary reason for your decision of denial was because lions found in Southern Africa is listed as threatened under 50 CFR 17.40(r) section 4(d), and your implementing regulations at 50 CFR 17.31. However I respectfully request you to reconsider the decision or issue a statement that such permit is not required. The reasons are laid out as follows:

1. According to your web page https://www.fws.gov/endangered/what-we-do/lion.html, the final lion rule regarding Panthera leo melanochaita was published in the Federal Register on December 23, 2015, and went go into effect 30 days after publication on **January 22, 2016.** My lion hunting took place on Jan 19-20, 2016, this is **before** the Act effective date. E*x post facto* laws are generally prohibited by clause 3 of Article I, Section 9 of the United States Constitution.

2. In your web FAQ page regarding lions, https://www.fws.gov/endangered/what-we-do/pdf/Lion_FL_FAQs_Final.pdf, page 3 specifically states:

   If I hunt a lion in Africa between December 23, 2015, the date the lion listing was published in the Federal Register, and January 22, 2016, when the listing goes into effect, do I need to obtain an import permit when I bring the trophy into the United States?

   No. Lions hunted in Africa before the effective date of January 22, 2016, would be considered to be "pre-Act" and exempt from the permitting requirements, regardless when it was imported into the United States. It is important, however, that you provide appropriate documentation establishing when the lion was hunted to the U.S. Fish and Wildlife Service Wildlife Inspector at the time of import.

I have included a hard copy of above reference web pages as evidence for your review. As you can see, it is unambiguous that my sport trophy lion import is legal and should be exempt from permitting requirement. As a caution for potential misunderstanding during import inspection process, I would respectfully request from you a statement to positively indicate my lion trophy import is exempt.

Should you have any questions, please do not hesitate to contact me at (b) (6) I would be happy to supply any further evidence that you may request.

Sincerely,

(b) (6)

Endangered Species

Ecological Services

Candidate Conservation »

Consultations »

Grants »

Foreign Species »

Listing and Critical Habitat »

Recovery »

Working With Tribes »

Partnerships in Conservation »

Lions Are Now Protected Under the Endangered Species Act

Lion in Botswana.

Photo credit: C.M. Perry & R. Sayers, Jr., used with permission

The U.S. Fish and Wildlife Service added two subspecies of lion under the Endangered Species Act due to these primary factors:

- Habitat Loss
- Loss of Prey
- Retaliatory Killing Due to Increased Human-Lion Conflicts
- Inadequate Regulatory Mechanisms
- Weak Management of Protected Areas.

Based on newly available scientific information on the genetics and taxonomy of lions, the Service assessed the status of the entire lion species. The new science resolved that the western and central populations of African lion are more genetically related to the Asiatic lion. These lions are now considered the same subspecies, *P. l. leo*. There are only about 1,400 of these lions remaining; 900 in 14 African populations and 523 in India. Considering the size and distribution of the populations, population trends and the severity of the threats, the Service has found that this subspecies meets the definition of endangered under the ESA.

The subspecies of *P. l. melanochaita* likely numbers between 17,000-19,000 and is found across southern and eastern Africa. The Service determined that this subspecies is less vulnerable and is not currently in danger of extinction. However, although lion numbers in southern Africa are increasing overall, there are populations that are declining due to ongoing threats. As a result, the Service finds the subspecies meets the definition of a threatened species under the ESA.

The final lion rule will publish in the *Federal Register* on December 23, 2015, and will go into effect 30 days after publication on January 22, 2016.

Concurrent with this final listing rule, to protect lions and other foreign and domestic wildlife from criminal activity, U.S. Fish and Wildlife Service Director Dan Ashe also issued a Director's Order to strengthen enforcement of wildlife permitting requirements. Through the Director's Order, the Service is redoubling its efforts to ensure that the world's rarest species are protected from those who violate wildlife laws. The Service has the authority to deny future permit applications for activities such as sport hunted trophy imports to anyone that has previously been convicted of or pled guilty to violations of wildlife laws. The order will ensure that this authority will be exercised to the fullest extent.

Read the Director's Order

The Service found that sport-hunting, if well managed, may provide a benefit to the subspecies. Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities. However, the Service found that not all trophy hunting programs are scientifically based or managed in a sustainable way. So in addition to protecting both lion subspecies under the ESA, we created a permitting mechanism to support and strengthen the accountability of conservation programs in other nations. This rule will allow for the importation of the threatened *Panthera leo melanochaita*, including sport-hunted trophies, from countries with established conservation programs and well-managed lion populations.

"The lion is one of the planet's most beloved species and an irreplaceable part of our shared global heritage. If we want to ensure that healthy

lion populations continue to roam the African savannas and forests of India, it's up to all of us – not just the people of Africa and India – to take action,"
- Service Director Dan Ashe

Read the News Release

Watch the Director's Video Message

Get answers to frequently asked questions

See the *Federal Register* notice

View the Species Profile

Lion range map.

Photo Credit: IUCN

Last updated: December 23, 2015

Frequently Asked Questions
Final Rule Listing Two Subspecies of Lion under the Endangered Species Act

About the Decision

What action is the U.S. Fish and Wildlife Service taking?
Following review of the best available scientific and commercial information, the U.S. Fish and Wildlife (Service) is listing the two subspecies of lion under the Endangered Species Act (ESA), *Panthera leo leo*, located in India and western and central Africa, as an endangered species and *Panthera leo melanochaita*, located in eastern and southern Africa, as a threatened species.

The Service is also finalizing a rule under section 4(d) of the ESA for *P. l. melanochaita*. The 4(d) rule will provide conservation measures for this subspecies by establishing a permitting mechanism for the importation of sport-hunted *P. l. melanochaita* trophies that will ensure hunting contributes to the survival of the species in the wild. The Service found that sport-hunting may provide a benefit to the subspecies if well managed, however, recent information received during the public comment period indicates that not all trophy hunting programs are providing benefits to the subspecies. The Service wants to ensure that U.S. trophy imports originate from countries with a scientifically sound management program and provide funds that further lion conservation.

With an endangered listing, all imports of *P. l. leo* will be generally prohibited, except when it can be found that the import will have a benefit to the species.

Caroline George

The final lion rule will publish in the *Federal Register* on December 23, 2015, and will go into effect 30 days after publication on January 22, 2016. For more information on the two subspecies of lion, including a copy of the final rule, please visit: http://www.fws.gov/endangered/what-we-do/lion.html.

What is different between the proposed and final rule to list lions?
The Service received new information from the International Union for Conservation of Nature (IUCN) that the western and central populations of lions are genetically closely related to the currently endangered Asiatic lion (formerly the endangered *Panthera leo persica*), and the IUCN has named this subspecies *Panthera leo leo*. The IUCN also found that the southern and eastern populations of lions are now their own subspecies, *Panthera leo melanochaita*. The Service has determined the two subspecies of lion qualify for different statuses under the ESA.

About Lions: Range and Population

2016

Why is the Service proposing to list one subspecies, *P. l. leo*, as endangered and the other subspecies, *P. l. melanochaita*, as threatened?
The Service received new information on population numbers for both subspecies. There are only a total of about 1,423 *P. l. leo* left: 900 in 14 populations in western and central Africa, and only 523 in India. Conversely, there are approximately 17,000-19,000 *P. l. melanochaita* found in southern and eastern Africa.

After reviewing the best scientific and commercial data available, the Service found the lion is impacted by a number of factors actively contributing to its population decline throughout Africa and Asia. The three main threats are habitat loss (fragmentation and degradation), loss of prey base and

human-lion conflict. The Service found that the only population of this subspecies found in India, though currently stable, is still facing threats and is highly vulnerable to stochastic (random) events, such as weather, fire, disease and other potentially devastating forces. If regional trends continue at its current rate, western and central Africa will likely lose a third of its population in five years and half the population in 10 years. Given the threats are acting on such a small number of *P. l. leo* the Service has determined that this subspecies meets the definition of an endangered species under the ESA.

Between 1993 and 2014, the population of *P. l. melanochaita* in eastern Africa declined by 59 percent. In southern Africa the lion population increased by 8 percent during the same time period; however, one of the largest populations, Okavango, and 6 unfenced reserves in Botswana, Namibia and Zimbabwe declined. However, eastern Africa is likely to lose a third of its population in 20 years and half the population in 30 years. Many of the increasing southern African populations are in small, fenced and intensely managed areas that have already reached carrying capacity.

Additionally, the human population, and thus negative impacts to lion associated with it, is expected to increase substantially by 2050; impacts of climate change are projected to manifest as early as 2040. Due to a larger population and greater number of populations, the Service believes this subspecies is less vulnerable to threats and is not currently in danger of extinction. However, the Service found that this subspecies is likely to become endangered within the foreseeable future. Therefore, the agency is listing *P. l. melanochaita* as threatened.

About the 4(d) Rule

Why does *P. l. melanochaita* need a 4(d) rule?
The Service is adding a 4(d) rule for *P. l. melanochaita* in order to create a permitting mechanism. During the public comment period the Service found that not all trophy hunting programs are scientifically based or managed in a sustainable way. This 4(d) rule creates a permitting mechanism to regulate the import of all *P. l. melanochaita* parts and products, including live animals and sport-hunted trophies, into the United States to ensure that imported specimens are legally obtained in a manner that is consistent with the purposes of the ESA and the conservation of the subspecies in the wild. It will allow for the importation of *P. l. melanochaita* provided they are permitted by the Service as originating from countries with effective lion conservation programs.

This 4(d) rule is intended to promote additional conservation efforts by authorizing only activities that would provide a direct or indirect benefit to lions in the wild. By providing incentives through the permitting process to countries and individuals who are actively contributing to lion conservation, the agency will be able to leverage a greater level of conservation than might otherwise be available.

The 4(d) rule will supersede the import exemption found in 50 CFR 17.8 for threatened wildlife listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), such that a threatened species import permit under 50 CFR 17.32 is now required for the importation of all *P. l. melanochaita* specimens.

Therefore, section 9(c)(2) of the ESA for the otherwise lawful importation of wildlife listed in Appendix II of CITES that is not an endangered species does not apply to this subspecies. Under this 4(d) rule, all otherwise prohibited activities, including all imports of *P. l. melanochaita* specimens, require prior authorization or permits under the ESA.

Will a permit be required to import a sport-hunted *P. l. melanochaita* trophy?
Yes. While there is evidence that many of the range countries have implemented or will implement best management practices, the Service wants to promote those practices to the extent it can. By requiring import permits, the agency can ensure these imports enhance the conservation of this lion subspecies in the range countries by supporting well-managed, scientifically based conservation programs that include trophy hunting of lions. For additional information on importing sport-hunted trophies, please visit http://www.fws.gov/international/permits/by-activity/sport-hunted-trophies.html.

African lions (includes all lions in Africa under the taxonomic classification currently used by CITES) are also listed in Appendix II of CITES. As such, a CITES export permit is required from the country where the trophy was taken. Contact the CITES authorities in that country for additional information and instruction. Click here for a list of national CITES contacts.

If I hunt a lion in Africa between December 23, 2015, the date the lion listing was published in the *Federal Register*, and January 22, 2016, when the listing goes into effect, do I need to obtain an import permit when I bring the trophy into the United States?

No. Lions hunted in Africa before the effective date of January 22, 2016, would be considered to be "pre-Act" and exempt from the permitting requirements, regardless when it was imported into the United States. It is important, however, that you provide appropriate documentation establishing when the lion was hunted to the U.S. Fish and Wildlife Service Wildlife Inspector at the time of import.

What criteria must be met for the Service to consider issuing a permit for the import of a sport-hunted *P. l. melanochaita* trophy?
The permitting program would allow importation of sport-hunted *P. l. melanochaita* trophies only from range countries that have management programs that are based on scientifically sound data and are being implemented to address the threats that are facing lions within that country.

Such management programs would be expected to address, but are not limited to: evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, the Service will work closely with the range countries and interested parties to obtain the best available scientific and commercial data. By allowing entry into the United States of *P. l. melanochaita* sport-hunted trophies from range countries that have scientifically based management programs, the range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities.

Is the Service allowing hunting of threatened *P. l. melanochaita*?
The 4(d) rule does not regulate hunting of *P. l. melanochaita*, but rather prohibits imports of sport-hunted *P. l. melanochaita*. Hunting, or take, of a wholly foreign species in its native country is not regulated by the ESA because the action is not subject to the jurisdiction of the United States. Regardless of U.S. import regulations, sport hunters are able to participate in *P. l. melanochaita* hunts in countries that allow it. However, many lions are taken by U.S. hunters, and conditioning the continued importation of sport-hunted trophies upon a demonstration that they originate from a country with a scientifically sound management program will encourage effective management for the species in the wild. In addition, a scientifically based management program that includes sport hunting can provide economic incentives for the range country and local communities to protect and expand lion populations and habitat.

What measures are in place to ensure that *P. l. melanochaita* sport-hunted trophies would not enter into illegal trade?

In the United States, CITES-implementing regulations clearly state that an Appendix-II, threatened species sport-hunted trophy may only be used for non-commercial purposes. Selling such a trophy after import constitutes a violation of the ESA. Import, export, re-export and foreign and interstate commerce of lions is prohibited without a permit to ensure that any lions or their parts or products, including hunting trophies, do not illegally enter into commerce. ESA violations carry a maximum penalty of one year in prison and a $100,000 fine; conviction under the Lacey Act is punishable by a prison term of up to five years and a $250,000 fine.

What does the Service consider in making enhancement findings for the import of sport-hunted trophies?

To determine whether to allow such imports, the Service considers factors such as the biological needs of the species; possible threats to the populations; current population estimates; management programs; legal protection (for sport-hunted trophies this includes hunting regulations and any applicable quotas); local community involvement; and, if any funds are generated by the import, how those funds are used for conservation. This rigorous evaluation process ensures that sport hunting is part of an overall conservation program supported by strong governance and management practices. By allowing imports from countries that are making strong efforts to conserve their lions, the Service will promote these countries' programs over those less willing to address long-term lion conservation.

How long will it take to process an application for the import of a sport-hunted *P. l. melanochaita* trophy?

Although the issuance of permits may initially be delayed because the Service lacks the necessary information on which to judge whether a country's management program for lions provides sufficient enhancement, we are already seeking information on *P. l. melanochaita* management programs of the range countries and will strive to make the required determinations as quickly as possible. If the agency has the necessary information from the range country where the hunting will occur, we are generally able to process permits within 45 to 60 days from the time of application.

About the Director's Order

Concurrent with this listing rule, to protect lions and other foreign and domestic wildlife from criminal activity, Service Director Dan Ashe is issuing a Director's Order to strengthen enforcement of wildlife permitting requirements. The order will ensure that violators of wildlife laws are not subsequently granted permits for future wildlife-related activities, including the import of sport-hunted trophies.

On February 11, 2014, President Obama issued the first National Strategy for Combating Wildlife Trafficking. One of the three strategic priorities of the strategy is to strengthen domestic and global enforcement, including assessing related laws, regulations, and enforcement tools.

This order, consistent with the strategy, establishes policy and procedure for Service employees to assert full legal and regulatory authority to deny wildlife violators the ability to obtain wildlife permits, certificates and licenses issued under 50 CFR part 13.

The Service will consider all relevant facts or information available, including relevant violations of a federal, state, foreign or tribal law or regulation related to or governing the activity for which they are applying, and may make independent inquiry or investigation to verify information or substantiate qualifications asserted by the applicant.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-58309C

December 5, 2017

Mr. Randal Chao
(b)(6)
Wilmette, Illinois 60091

Dear Mr. Chao:

This letter responds to your November 28, 2017, request for reconsideration of our November 13, 2017, denial of your application for a permit under the U.S. Endangered Species Act (Act) to import a sport-hunted lion (*Panthera leo melanochaita*) hunted in the Free State Province, South Africa.

Based on information in your request and our further review of your application, it appears that your trophy falls within the window just prior to the formal listing of the lion as threatened under the U.S. Endangered Species Act. Therefore, because your lion was hunted just prior to its listing date, you are not required to obtain a permit from this office in order to import your trophy. Your application fees will be refunded to you in six to eight weeks.

You may wish to contact the port where your trophy will enter to discuss what documentation you will need to show to inspectors regarding "pre-Act" status at the time of inspection and clearance.

If you have any questions, please contact Biologist Caroline Harlow of this office: Division of Management Authority, Branch of Permits, MS: IA, 5275 Leesburg Pike, Falls Church, Virginia 22041-3803 (1-800-358-2104, ext. 2296 or 703-358-2296).

Sincerely,

Jorge D. Villavicencio
Supervisory Policy Specialist
Branch of Permits
Division of Management Authority

RCVD NOV 28 2017

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
STEINER	RICHARD	FREDERICK	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b)(6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b)(6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b)(6)				
1.b. City	**1.c. State**	**1.d. Zip code/Postal code:**	**1.e. County/Province**	**1.f. Country**
WESTMINSTER	COLORADO	80234	ADAMS	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	**2.c. State**	**2.d. Zip code/Postal code:**	**2.e. County/Province**	**2.f. Country**

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA33614C-1 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other [redacted] and I certify that the information submitted in this application for a permit is complete and accurate to the [redacted] statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6) 11/17/2017

[redacted] of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      PANTHERA LEO. AFRICAN LION.

   b. Sex (if known).

      MALE

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      CENTRAL AFRICAN REPUBLIC. HAUT MBOMOU PROVINCE. NEAREST CITY IS DJEMA.

   b. Date wildlife is to be hunted:

      27 FEBRUARY 2018 THROUGH 20 MARCH 2018.

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      SKIN, SKULL, CLAWS.

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	MR. ALAIN LEFOL
Business Name:	NATIONAL SAFARIS
Address:	BP 483
Address:	
City:	BANGUI
State/Province:	
Country, Postal Code:	CENTRAL AFRICAN REPUBLIC

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] Date: 11/17/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
RICHARD F. STEINER, (b)(6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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CHRISSIE JACKSON
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March 4, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 15 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find three applications to import sport-hunted lion trophies. The first applicant is hunting in South Africa, at Khamab Kalahari Game Reserve, an area that has been designated to have "wild" lion by South Africa's Department of Environmental Affairs. Please refer to the attached list and information in the DMA's files, which includes the management plan for this reserve. The applicant is lawfully hunting a lioness as a population control measure, as explained in the attached justification. Please consider that information and the information previously submitted by South Africa's DEA and Conservation Force in making a positive enhancement finding for this applicant.

The second applicant is hunting in Tanzania with Rungwa Safaris/Bundu Safaris. This operator has submitted an enhancement report, which was sent to the DMA in October 2016 and is attached for ease of reference. Please consider that information and the information previously submitted by Tanzania's Ministry of Natural Resources and Tourism/Wildlife Division/Tanzania Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

The third applicant is hunting in Zimbabwe in the Dande South concession. This concession incorporates extensive anti-poaching and community investment. We will shortly submit an enhancement report from this operator. Please consider that information and the information previously submitted by Zimbabwe's Parks and Wildlife Management Authority, Conservation Force, and others in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed, wild-managed African lion trophy from South Africa.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Matthew Morgan

Date: 2/20/18

MAR 15 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Moroun	Matthew	John	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)		None.	

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		N/A	N/A

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Grosse Pointe Farms	MI	48236	Wayne	U.S.

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Warren	MI	48051	Macomb	U.S.

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts*** ***of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my kno that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature (in b onsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 2/20/18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Coenraad Vermaak Safaris Hilton South Africa
   b. Date wildlife is to be hunted: July 11th - 18th 2018
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

all parts for Life Size Mount - Skin, Skull, teeth, Claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Dieter Ochsenbein
Business Name:	Highveld Taxidermists
Address:	Farm 354
Address:	Vlakplaats
City:	Hennopsriver 0023
State/Province:	South Africa
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). [redacted] and that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] (b)(6) Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

Subject: FW: lioness
From: "Hans - Coenraad Vermaak Safaris" <hans@cvsafaris.co.za>
Date: 2/19/2018 8:56 AM
To: "'John J. Jackson, III'" <jjj@conservationforce.org>, "'John J. Jackson, III'" <jjw-no2@att.net>, "'John J. Jackson, III'" <cf@conservationforce.org>
CC: "'Robyn Worthington'" <info@cvsafaris.co.za>

Hi John, here is the motivation to hunt 1 possibly 2 lionesses at Khamab this year. Let me know if this will cover what is required by USFW? John, have you heard from Matt Mouron?

Note below from Hanno, the reserve ecologist.

Hi Scruff and Johan

Attached the motivation for the hunting of the lioness. I think this should be sufficient as it describes in detail how it fits in with the National lion BMP as well as the KKR lion management plan.

Scruff, let me know if anything else is needed from our side for now?

I have spoken to the Northwest Conservation officials and the permit should not be any problem as we are one of the 4 approved reserves.

Best regards

Hanno

Hanno Kilian

Reserve ecologist

Khamab Kalahari Reserve (Pty) Ltd.

e-mail: ecologist@khamab.co.za

Cell: 082 851 7296

Scruff

Coenraad Vermaak
safaris
DEDICATED TO EXCEED YOUR EXPECTATIONS

Hans Vermaak hans@cvsafaris.co.za

P O Box 1084
Hilton 3245 South Africa
Tel: +27 (0)33 815 9604
Fax: +27 (0)86 577 5957
Office: info@cvsafaris.co.za
www.cvsafaris.co.za

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Attachments:

Motivation for hunting of lioness 2018.pdf	64.0 KB

MOTIVATION FOR THE HUNTING OF AN ADULT LIONESS ON KHAMAB KALAHARI RESERVE

Prepared by Hanno Kilian, Reserve Ecologist, Khamab Kalahari Reserve.

E-mail: ecologist@khamab.co.za

A Biodiversity Management Plan (BMP) for the African lion (*Panthera leo*) in South Africa was published for implementation in December 2015 in accordance with the National Environmental Management: Biodiversity Act (10/2004) (Gazette no. 39468). The wild managed lion metapopulation is one of three recognised lion populations in South Africa, the other two being the wild lion population and the captured lion population (BMP). The wild managed lion population typically occurs in fenced game reserves that are typically <1000km^2 in size. Fencing of reserves is seen mostly in South Africa, and few fenced reserves are seen in the rest of southern Africa. There are various pro's (Packer et al 2013) and con's (Creel et al 2013) of using fencing as hard boundaries of game reserves, but the reality is that fencing is unfortunately an essential component of lion conservation in the future as habitats get more fragmented (Riggio et al 2013) and human populations pushing towards boundaries of conservation areas. The managed lion population could therefore be an important example of conservation of lions in a changing African context.

However, because of the fragmented nature of the fenced reserve, the conservation value of these populations has been questioned (Slotow & Hunter 2009). Furthermore, management of these fragmented and isolated populations create problems as many of the natural processes that occur in large naturally functioning lion population were disrupted in the small fenced reserve. As it is almost impossible to restore these processes on these fenced reserves, another approach is needed. The approach that has been adopted to overcome these problems is to mimic the outcome of these natural processes through management interventions (Miller et al 2013) in a metapopulation approach (Selier & Ferreira 2017).

Disruption in social dynamics were identified as one of the key drivers of challenges in managed wild lion populations, of which rapid population growth and degraded predator-prey relationship are the most important (BMP). It is some of the basic biological characteristics of lions where the opportunity lies to mimic behaviour and dynamics of lion prides. These characteristics include ages of first breeding, litter intervals, cub survival, litter sizes, female dispersal and age of last breeding (Miller et al 2013). Several suggestions have been identified on how to mimic the outcomes for natural processes, which includes contraception, unilateral tube tying, translocations and removal of females, which are all recognised by the by the Lion Biodiversity Management Plan for South Africa (BMP).

To mimic the social and population dynamics of females and maintain an average pride size of four females, one or more of the following five management options are recommended:

1. Increase the age at first reproduction using contraception of sub-adult females;
2. Establish longer intervals between births using contraception of adult females;
3. Reduce age specific fecundity through reduced litter sizes using unilateral tube-tying of fallopian tubes;
4. Mimic female dispersal by removing as well as introducing sub-adult females at infrequent irregular intervals (on average once every 5 to 10 years);
5. Mimic higher death rates of old females by removing (through hunting/translocation) the oldest females (typically >10 years of age) in the pride.

The lion management plan of Khamab Kalahari Reserve (KKR) (Kilian 2016) has identified the same possibilities to mimic behaviour and population dynamics as those specified in the National BMP. However, in the lion management plan of KKR, the restoration of some of the biological process involved in lion dynamics are given priority above mimicking of the natural control mechanisms, which are far more invasive and management intense. Here mimicking especially refers to the use of contraceptives and other birth control options like unilateral tube tying or removal of ovaries. The restoration of biological process in lion populations would involve managing the population in such a way to promote natural pride structures, as well promoting male lion turnover, and facilitating the presence of roaming bachelor male coalitions on the reserve.

One of the problems identified with managed wild lions is the inclination of adult females to become loners (Miller et al 2013) and not associate in pride structures. This especially disrupts predator-prey dynamics, which results in an increase in overall predation, which can be a problem on fenced reserves. This has been flagged as a potential problem in the lion management plan of KKR, and which is something that was specifically highlighted as something that must be avoided (Kilian 2016). The female offspring of lone lionesses also tend to develop into lone females when they grow up (pers obs), which exacerbate the problem even further.

The KKR management plan suggests that females that spend more time on their own (or with their own offspring only) than with other lion groups, should be removed from the population to promote the development of stronger pride structures, as is the case in wild lion populations. These females can then either be removed through translocation if there are translocation options available, removed through hunting if they don't have dependant cubs, or euthanised as last resort.

Where translocation is not an option, trophy hunting can be a valuable meta-population management tool for South Africa's managed wild lions in the following instances (Selier & Ferreira 2017):

a. Removal of the oldest females (typically >10 years of age) in the pride to mimic higher death rates of old females.
b. Removal of sub-adult males (typically 2-4 years old) to mimic male dispersal.
c. Removal of the dominant male/s every 3 years to mimic pride take-overs.
d. Removal of oldest males (typically >8 years old) to mimic higher death rates of old males.

KKR has identified three lionesses that the fits the criteria of spending more time on their own than with other lions in a pride, and therefore do not form part of any pride. As per the KKR lion management plan (Kilian 2016), these lionesses should be removed from the population by one of the means identified above. Furthermore, it also coincides with the option above of mimicking higher death rates of older females as a management tool in the lion meta-population as identified by the BMP.

Options for the removal through translocation of older (10yr) adult females are extremely rare, and any possible translocation option will be pursued if they become available. KKR has decided to make at least one of these females available for hunting in 2018. This, however, will be dependent on her not having cubs at the time of the hunt, or not associated with a pride at that stage.

KKR is one of four reserves that were identified by the Scientific Authority and recognised by the Department of Environmental Affairs (DEA) as reserves where hunting of managed wild lions can take place. Hunting of lion forms an integral part of the management toolbox of the lion management plan on KKR, together with live removals and translocations, as well as the restoration of natural processes and conserving genetic diversity.

The removal of these old lionesses will benefit the lion population as a whole as it forms part of the process that KKR embarked on to restore natural lion social dynamics, and at the same time reducing the predation impact of the lion population on the game population of KKR. Hunting of one of these lionesses will therefor only have positive impact on the lion population, while also providing additional income to the reserve to assist in managing the reserve and its animal populations in a responsible and sustainable manner.

References

Creel, S., Becker, M.S., Durant, S.M., M'Soka, J., Matandiko, S., et al. (2013). Conserving large populations of lions – the argument for fences has holes. Ecol Lett doi: 10.1111/ele.12145

Selier, J. & Ferreira, S.M. 2017. Guidelines for the implementation of a meta-population management plan for managed lions in South Africa, with specific reference to trophy hunting. Unpublished Report, SANBI & Sanparks, Pretoria.

Kilian, P.J. 2016. Lion Management Plan for Khamab Kalahari Reserve. Unpublished report, Khamab Kalahari Reserve.

Miller, S. M., C. Bissett, A. Burger, B. Courtenay, T. Dickerson, D. J. Druce, S. Ferreira, P. J. Funston, D. Hofmeyr, P. J. Kilian, W. Matthews, S. Naylor, D. M. Parker, R. Slotow, M. Toft, and D. Zimmermann. 2013. Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and guidelines. South African Journal of Wildlife Research 43:138–154.

Packer, C., S. Canney, A. Loveridge, S.T. Garnett, M. Pfeifer, K.K. Zander, A. Swanson, D. MacNulty, G. Balme, P.J. Funston et al. (2013). Conserving Large Carnivores: Dollars and Fence. Ecology Letters doi: 10.1111/ele.12091

Riggio, J., Jacobsen, A., Lichtenveld, L., Funston, P.J., Dollar, L, Bauer, H, De Iongh, H, Groom, R. & Pimm, S. (2013). The size of savannah Africa: a lion's (Panthera leo) view. Biodiversity and Conservation 22:17–35.

Slotow, R. & Hunter, L.T.B. (2009). Reintroduction decisions taken at the incorrect social scale devalue their conservation contribution: the African lion in South Africa. In: M.W. Hayward & M.J. Somers (Eds.), Reintroduction of Top-Order Predators. (pp. 41-73). Wiley-Blackwell, Oxford.

Vannorman, Tim <tim_vannorman@fws.gov>

South Africa Lion Properties

1 message

Mpho Tjiane <MTjiane@environment.gov.za> Wed, May 31, 2017 at 2:29 AM
To: "tim_vannorman@fws.gov" <tim_vannorman@fws.gov>
Cc: Craig Hoover <craig_hoover@fws.gov>

Dear Tim

Please note the attached lion properties that are approved by our Scientific Authority as contributing to Conservation.

Please note we have removed the reserves that do not hunt lions and added one new one. If you receive an application with none of these properties please contact us for verification.

Regards

Mpho Tjiane

Deputy Director: CITES Policy Development and Implementation

Biodiversity and Conservation

Private bag X447,Pretoria

Environmental House,473 Steve Biko, Arcadia

Pretoria 0083

Tel: +27 (0) 12 399 9596 Fax: +27 (0) 012 359 3604

Cell 0839806409 Email: mtjiane@environment.gov.za

Call Centre No: +27 (0) 86 111 2468 website www.environment.gov.za

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South African Lion Properties eligible for Hunting 2016.xlsx
12K

Name of place	Province	Area (ha)	Ownership
Kalahari Oryx Private Game Reser	Northern Cape	86,948	Private
APNR	Mpumalnaga	170000	Private
Mapunbubwe Game Reserve	Limpopo	19 000	L. Ramqeuist
Khamab Kalahari Reserve	North West	90000	Private

Landowner	Ecologist/ Manager Contact details	Purpose
Dr C.H. Wiese	Mr. Johan Maritz (General Manager), Cell +27 83 406 9729, johan@kalahari-oryx.com	Conservation
Various: KPNR	Colin Rowles (Manager) Klaserie Private Nature Reserve	Conservation
Various: TPNR	Bryan Havemann (Warden) Timbavati Private Reserve	Conservation
Various: UPNR	Mark Shaw (Reserve Representative)Umbabat Private Game Reserve	Conservation
Various: BPNR	Craig Spencer (Warden) Balule Nature Reserve	Conservation
E. Small	079 524 1635	Conservation
J. Odendaal	Mr Hanno Killian - Cell 082 770 2838, ecologist@khamab.co.za , Mr J. Odendaal (Manager): 082 375 9381	Conservation

Nature of population	Method of enumeration	Numbers
Free range, extensive	Known individuals	25-35
Free range, extensive	Census	62
Free range, extensive	Census	69
Free range, extensive	Minimum known numbers	21
Free range, extensive	Minimum known numbers	58
Natural free roaming small populati	Minimum known numbers	Approx 12
Free range, extensive	Known individuals	28

Nelson, Emma <emma_nelson@fws.gov>

[EXTERNAL] Permit Application No.: 82926C (Matt Moroun) - Taxidermist address change request

2 messages

Leslie Gallardo <leslie.gallardo@conservationforce.org> Thu, Jul 19, 2018 at 11:56 AM
Reply-To: Leslie Gallardo <leslie.gallardo@conservationforce.org>
To: emma_nelson@fws.gov
Cc: "cf@conservationforce.org cf@conservationforce.org" <cf@conservationforce.org>

Dear Emma,

Hope your day is great, We at Conservation Force are requesting that you change the taxidermist address on the above referenced Permit Application (82926C), (Question No. 8):

FROM:

Dieter Orchsenbien, Highveld taxidermists. Farm 354, Vlakplaats, Hennopsriver, South Africa/0023

TO:

Splitting Image Taxidermy

The Badger Building

14 Uitenhage Road

Sydenham

Port Elizabeth

6001

Contact Number +27 (0)41 811 9729

We thank you for your help and please contact me should you need additional information.

Leslie Gallardo

Conservation Force

(504) 837-1233

Nelson, Emma <emma_nelson@fws.gov> Wed, Aug 15, 2018 at 9:49 AM
To: Leslie Gallardo <leslie.gallardo@conservationforce.org>
Cc: "cf@conservationforce.org cf@conservationforce.org" <cf@conservationforce.org>

Good morning Ms. Gallardo,

Thank you for your email. Your request has been noted.

Thank you,

Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296
[Quoted text hidden]

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT-82926C

Enhancement Finding
Applicant: Matthew John Moroun (PRT-82926C)

Matthew John Moroun submitted an application on March 15, 2019, for the importation of one male African lion (*Panthera leo melanochaita*) from Khamab Kalahari Reserve, North West Province, South Africa for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of South Africa, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken in July, 2018, from this wild lion (*P. l. melanochaita*) population within South Africa **meets** the enhancement criteria under 50 CFR 17.32.

U.S. Governance of the Lion:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes South Africa, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the

prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from South Africa, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in South Africa.

In evaluating the available data on lion hunting in South Africa, the Service understands that South Africa has three classifications for lions: wild, wild-managed, and captive-bred and classifies wild and wild-managed lions separately from captive-bred lions raised for hunting purposes since the management and oversight of these specimens is different within South Africa. Therefore, information relevant to the Service's consideration on whether to permit the import of a sport-hunted trophy from Khamab Kalahari Reserve, a reserve which maintains a population of wild lions, must be evaluated based on information pertaining to the management of wild and wild-managed lions in South Africa.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in South Africa contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Moroun's application involving a *P. l. melanochaita* sport-hunted trophy taken in Khamab Kalahari Reserve, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Khamab Kalahari Reserve. This document sets out guidance from experts in the field on the

use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all

relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Moroun's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how South Africa's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also consider how a U.S. hunter's, in this case, Mr. Moroun's, participation in the hunting program contributes to the overall management of lions within a country.

The management program in South Africa for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for

conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On January 12, 2016, the Service sent a letter to South Africa's Department of Environmental Affairs (DEA) with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in South Africa, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our January 12, 2016, letter, the DEA provided four documents. In addition, the Service met with representatives of DEA during the 17th Meeting of the Parties to the Convention in Johannesburg in late September 2016. Further, since those meetings, there have been several written exchanges with DEA discussing the DEA's evaluation of reserves with lions and how these animals conform to DEA's lion management plan. The four documents provided to the Service in January 2016, along with the Service's own final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DEA, comments received from interested parties, and Mr. Moroun's application were the basis of this finding.

South Africa has defined three populations of lions that exist within the country through their Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP; December 2015): *Wild lions,* who completely fulfill their role in biodiversity processes and are largely unmanaged, and exist only in formally proclaimed national parks and game reserves. This population's vital rates and demographics are not actively manipulated; *Wild-managed lions,* which include all lions that have been re-introduced into smaller fenced reserves (<1000km^2), and are managed to limit population growth and maintain genetic diversity. Some of the vital rates and demographics of these lions are actively manipulated; and *Captive lions*, bred for financial gain, where all vital rates and demographics of these populations are actively manipulated.

***Governance of Lions in South Africa*:** The lion is listed as vulnerable in the South African list of Threatened and Protected Species (ToPS) under Section 56(1) of the National Environmental Management Biodiversity Act, 2004 (Act no 10 of 2004; NEMBA; BMP pg. 1). NEMBA further

regulates a permit system regarding restricted activities involving specimens of listed threatened or protected species (Act no 10 of 2004; Chapter 7). Regulated activities in need of registration include, among others, captive breeding facilities, sanctuaries, scientific institutions, game farms, wildlife traders, wildlife product traders, taxidermists, wildlife translocators, and freight agents (NEMBA pg. 25).

NEMBA gives effect to the Convention on Biological Diversity (CBD), of which South Africa is a party, and Section 24 in the Bill of Rights of the Constitution of the Republic of South Africa (1996). Under Section 24(b): "everyone has the right to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development" (BMP pg. 15).

In addition to South Africa's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, South Africa provided a copy of their 2015 CITES non-detriment finding (NDF) for lions. Their finding, while focusing only on wild and wild-managed lions, applies to all lion exports from South Africa, including the captive lion population. This was clarified through personal communication with the South African Management Authority, where the Service was informed that the finding may be amended to better clarify that the finding applies to all lions within South Africa. A copy of the DEA's most recent lion NDF, dated January 23, 2018, which was included in a previous permit application, provides information on wild, wild-managed, and captive-bred lions and continues to find that the export of the species will not be detrimental to the survival of the species in the wild.

South Africa is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

In 1991, South Africa legalized private ownership of wildlife, leading to a significant rise in game ranches and farms. In 2010, private lands with wildlife covered approximately 16.8% of South Africa, compared to national and provincial protected areas accounting for only 6% (Cousins *et al.* 2010). It has been stated that this expansion of private lands and the wildlife industry resulting from the private ownership of wildlife is responsible for significantly increasing South Africa's large mammal populations (Crowley and Mokhema 2014). According to Crowley and Mokhema (2014), South Africa's game ranching industry is worth $1.1 billion a year and is growing at 10 percent annually. The lion is listed as vulnerable in the South African list of Threatened and Protected Species (ToPS) under Section 56(1) of the National Environmental Management

Biodiversity Act, 2004 (Act no 10 of 2004; NEMBA; BMP pg. 1). NEMBA further regulates a permit system of restricted activities involving specimens of listed threatened or protected species (Act no 10 of 2004; Chapter 7). Regulated activities in need of registration include, among others, captive breeding facilities, sanctuaries, scientific institutions, game farms, wildlife traders, wildlife product traders, taxidermists, wildlife translocators, and freight agents (NEMBA pg. 25). Depending on the requesting entity, the issuing authority is either the Minister (DEA) or the appropriate Provincial government (MEC). Under ToPS, wild lions should not be introduced into captivity. This permitting regime generates funds for national conservation efforts, while allowing landowners to profit from maintaining wildlife on their property. The landowners can then reinvest in the property by funding conservation efforts, managing wildlife, and carrying out anti-poaching efforts (Cousins *et al.* 2010).

Current Lion Status in South Africa: The lion was almost extirpated in South Africa by the early 1900s, remaining only in small numbers in what is now Kruger National Park (NP) and the Kgalagadi Transfrontier Park (TP). With the formation of Kruger NP in the 1920s, wild lion numbers slowly recovered, growing to the current population of approximately 1,700 lions (BMP, pg. 40). Kgalagadi TP has a stable, albeit smaller, population of approximately 400 lions, but is considered a lion stronghold in southern Africa. Lions recolonized Hluhluwe-iMfolozi Park (HiP) in the 1950/1960s and that population is currently stable at approximately 120 lions. Along with small groups of lions in Addo Elephant National Park, Karoo National Park, Marakele National Park, there are approximately 2,200 wild lions in South Africa. In addition, there are approximately 800 wild-managed lions separated among 45 fenced reserves of less than 1,000 square kilometers each (BMP pg. 40). It should be noted, however, that DEA is evaluating each of these fenced reserves to confirm that the lions maintained on the reserve can be classified as wild-managed. As such, the Service evaluated this application, in part, based on DEA's evaluation of the reserve where the lion was taken.

When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. These three threats led to the shrinking of lion populations and their range from pre-Colonial South Africa, to the current situation of lions being found predominantly on a limited number of national parks and fenced reserves. However, given the current focus of wildlife management practices in South Africa on fencing protected areas, additional habitat loss has been minimized. Further, due to more intensive management of the fenced reserves to maintain biodiversity, more stable prey bases and limited human-lion conflict are being observed.

According to South Africa's Scientific Authority's 2017 NDF published in January 2018, there are no specific official figures on the illegal trade in lions and lion products in South Africa, which is consistent with their 2015 NDF. There are currently no statistics relating to cases involving lions in the National Environmental Compliance and Enforcement Report, although there are cases currently under investigation. No recorded or known illegal trade in wild lion has occurred in Gauteng, KwaZulu-Natal or the Eastern Cape, and the illegal utilization of lions within South Africa's national parks is negligible. However, according to the NDF, lions along the Kgalagadi Transfrontier Park boundaries have been persecuted for decades. Illegal trade in captive-bred lions within the North West Province is suspected to take place, as this industry is large and a challenge

to regulate. The 2017 NDF does not discuss in further detail the reports referenced in the 2015 finding, regarding the illegal translocations of animals or trade in lions and their body parts for which offenders were not in possession of a permit to breed, keep, hunt, catch, sell, convey or export live animals or parts thereof. According to the 2015 and 2017 NDF, and supported by information in the Service's final listing rule, the illegal local and international trade in lions poses a moderate, but non-detrimental risk to the species in South Africa (BMP pg. 14; USFWS 2015, 80 Fed Reg. 79999).

To manage any population to maintain an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population estimates and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number of lions estimated to constitute a viable population is 500 individuals. Kruger National Park, with approximately 1,200 lions, has a stable population of wild lion and is considered a stronghold for lions in South Africa. Kgalagadi Transfrontier Park, with a stable population of approximately 400 lions, is considered a potential stronghold and conserves the genetic diversity within the Kalahari ecosystem (Bauer et al. 2008, in Riggio et al. 2013 (pg. 32); Bjorkland 2003 (pg. 515, 518). Wild lions in HiP, Addo Elephant National Park, Karoo National Park, and Marakele National Park, albeit smaller in size, appear to be stable, but would need to grow to be considered potential strongholds for maintaining genetic diversity. All of these populations receive very little direct management and hunting is not allowed within the National Parks (BMP).

Lion Management in South Africa: In 2015, in response to the requirements under NEMBA and the SADC Treaty, and after stakeholder workshops in 2013 and 2014, South Africa published the Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP) and stated that the "BMP for African lion will be regarded as the national strategy for African lions in South Africa" (pg. 2). The BMP was created in response to the Regional Strategy for Lions in East and Southern Africa in 2005 (IUCN SSC Cat Specialist Group 2006), which encouraged the development of national strategies aligned with national strategies of neighboring countries. The BMP was developed jointly by South Africa's Department of Environmental Affairs, Council for Scientific and Industrial Research (CSIR), and Dr. Paul Funston (Panthera). The current BMP is the first in a series of five-year iterations, as required under NEMBA, where the success of the preceding five years will be measured, and adaptations made to ensure that the plan for the following five–year period is appropriate for the circumstances at the time.

The BMP has identified the vision that "...lions will provide Moroun opportunities for biodiversity conservation, economic development, social benefits, and improved management capacity." The BMP lays out five specific objectives for the conservation of wild and wild-managed lions within South Africa:

- Improve the conservation status of lions within the broader conservation context.
- Develop and implement effective communication tools that are informed by scientific research (communication, education, and public awareness).
- Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws.

- Establish a lion forum or working group.
- Collaborate the alignment of this BMP with lion conservation plans in neighboring countries and link with international working groups.

All five of these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the party responsible for implementation. The BMP will be re-evaluated in 2019 to assess the success of the plan and to modify the BMP for 2020 to 2025 accordingly.

While these five objectives appear to serve a valuable role in lion management in South Africa, two are most relevant in determining if the implementation of the BMP enhances the propagation or survival of the species, as required by the Act for the issuance of this import permit. The first objective, "Improve the conservation status of lions", has been broken down into three sub-objectives for wild and wild-managed lions: maintain current protection status of lions; reassess the conservation status of lions; and enhance the conservation status of wild lions. The intended 5-year outcomes of these sub-objectives are to have stable wild lion populations in all protected areas with no illegal trade in wild lions, have more than 80% of all reserves with wild-managed lions integrated into a managed meta-population approach for genetic management, publish norms and standards for the management of wild-managed lions, and a stronger understanding of wild-managed lion population size and trends. To achieve these sub-objectives, South Africa has already conducted population surveys of wild lions in 2015 and will census every 3 years. They have also started implementing the managed meta-population plan with the goal of over 80% of reserves included by 2019. The norms and standards for the management of wild-managed lions was to be completed by the end of 2016 and the first audits to obtain a stronger understanding of wild-managed lion population trends was completed in 2015 and is supposed to continue annually thereafter. One of the first outcomes of these evaluations has been the apparent tightening of how DEA assesses whether a reserve holds "wild-managed" lions or if the lions on a reserve are considered "captive-bred". As such, the Service consulted with the DEA on whether the reserve identified in this application where the trophy animal will be taken maintains wild-managed lions.

The second objective, "Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws", identifies two actions: ensure alignment on permitting decisions between national and provincial legislation; and address and implement training needs for all aspects of legislation regarding lions. The intended 5-year outcome of these two actions is to have well-trained managers that make better management decisions, and effective legislation to support lion conservation and sustainable utilization of lions.

The BMP has two additional objectives focusing specifically on wild-managed lions. As with the objectives discussed above, these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the parties responsible for implementation. The first is to maintain the wild-managed lions as a key population that contributes to socio-economic-ecological opportunities through mimicking "natural" ecological functions (e.g., wild lion survival rates, fecundity, litter sizes, and mortality rates). This objective is broken down to a number of action items ranging from mimicking survival changes through lethal and non-lethal removals, mimicking required immigration/emigration into an area, and measuring

demographic responses by determining age- and sex-structure through ranger observations, and informing stakeholders on progress of management efforts. These action items predominately have target dates that are on-going, annual, or bi-annual, with outcomes that can be used- in adaptive management efforts.

The second wild-managed lion objective is "To maintain lion genetic integrity by inducing social limitations through management-assisted dispersal and changes in dominance hierarchies", which focuses primarily on ensuring that lions within smaller fenced areas (<1,000 sq. km.) mimic natural biological processes such as natural dominance hierarchies and female dispersal to ensure genetic diversity. The action items for this objective include modeling genetic diversity within reserves, mimicking male dispersal from and into a social unit through removal (e.g., culling/hunting or translocation) and introduction (translocation) of males at appropriate ages, and mimicking occasional female dispersal into social units through removal and introduction.

The BMP has information on the lion's biology, habitat requirements, threats, and relevant legislation, as well as an extensive chapter on wild-managed lions. This chapter explores the history of wild-managed lions, particularly how lions had been managed in the past and what actions are needed to move forward in establishing a meta-population through connecting the reserves and allowing for genetically viable populations that can contribute to the overall wild lion population. According to the BMP, the wild lion populations are complemented by a fragmented population of wild-managed lions in South Africa found on fenced areas or reserves typically less than 1,000 square kilometers in size. This largely results from private property as well as wildlife ownership rights enforced by fencing as required by South African law. According to the BMP, even though opinions vary on the pros (Packer et al. 2013) and cons (Creel et al. 2013) of fencing as an essential component of range-wide lion conservation in the future, the use of fences is likely to increase as human land use continues to expand into lion ranges. The expanded use of fencing, particularly in areas where fencing is currently not widely utilized, could lead to continued fragmentation of lion habitats (Riggio et al. 2012, Dolrenry et al. 2014). Therefore, wild-managed lions in South Africa provides a key example on how to achieve integrated lion conservation goals in a changing African context that would enhance the survival of the species.

In the 1990s, the number of public and private game reserves started to increase in South Africa and many of them reintroduced lions, mostly as a tourist draw. Lions from these populations were then used for yet more reintroductions leading to a current number of about 800 lions on over 45 fenced reserves (Miller et al 2013). Many of these reserves have only one or two prides of lions, with the largest (Pilanesberg National Park and Madikwe Game Reserve) having four or five prides. Historically, most managers of these reserves had the tendency to manage their lion populations in isolation, although there was some movement of 'excess' lions.

Because of fragmented, isolated management of these populations, the conservation value of these lions has been questioned in the past (Hunter et al 2007, Slotow & Hunter 2009). Because of this, the BMP sets out management criteria within the reserves that maintains ecological processes and creates a meta-population (BMP pg. 41 and 42). Researchers noted indicators of inbreeding in two reserves (Trinkel et al. 2008, 2010), while several reserves experienced increased lion population growth rates with subsequent high lion densities (Miller & Funston 2014). The combination of high

lion densities and restricted size of the reserves disrupts predator-prey relationships – often with prey dramatically declining (Tambling & du Toit 2005, Slotow & Hunter 2009). In addition, managers increasingly find it hard to locate new areas for 'excess' lions (Kettles & Slotow 2009). The Lion Management Forum (LiMF), founded in 2010, provides a platform for concerned managers to discuss the unique issues surrounding small, fenced lion populations. LiMF members recognize that many of the natural processes characteristic of large naturally functioning lion populations have been disrupted on these small reserves. Given the small sizes of these reserves, limited opportunities exist for restoration of these natural processes Therefore, LiMF, and the BMP, have put forward management interventions that would mimic the outcomes of natural processes that are showing great success (Miller et al. 2013; Ferreira & Hofmeyr 2014).

The BMP recognizes that the managed lion meta-population is slightly contradictory to the theory of meta-population dynamics, as meta-populations are those with spatio-temporally variable subpopulation dynamics, variable dispersal, and availability of empty habitats that are largely connected (Oliveier et al. 2009). That is not the case with most wild-managed lion populations on small reserves in South Africa. Thus, in essence, the managed meta-population is a unique product of the South African response to managing and conserving large carnivores on isolated small reserves. The approach essentially recognizes a single population with social groups spatially isolated over vast areas. Some of these challenges can be reconciled through identifying regional nodes.

The lions for reintroductions into South Africa's small reserves were initially sourced from Etosha National Park, as well as Sabi Sand Game Reserve, adjacent to the Kruger National Park. Recently, SANParks relocated some animals from the South African park of Kgalagadi Transfrontier Park (Slotow & Hunter 2009). Managers applied minimal genetic management throughout the history of lion reintroductions (Slotow & Hunter 2009, Trinkle et al. 2010). As a result, geographic genetic structure in the wild-managed lion meta-population reflects mixed origins with few reserves having lions of only one origin (Miller et al. in review). The South African wild-managed lions thus represent a novel lion genetic diversity not associated with a single origin. Maintaining the origin of the base genetic stock is thus, according to the BMP, a low priority (BMP pg. 45).

Hunting and Utilization:

Hunting: According to the 2017 NDF (the last assessment available to the Service), hunting of wild lions is not allowed within national parks and only limited hunting is allowed in some provincial reserves, effectively ensuring protection for the majority of wild lions. There is some harvest of wild lions for the control of problem animals (e.g., stock-raiding) and, in very limited cases, population management within the national parks. In addition, a small number of wild lions from Kruger NP have dispersed out of the park into some of the reserves surrounding the park and may be harvested. According to the BMP, fewer than 2 wild lions and only approximately 10 wild-managed lions are taken off of private reserves annually.

South Africa has not set a specific annual quota for wild-managed lions. Instead, according to information provided to the Service, authorizations for hunting wild-managed lions are addressed on a case-by-case basis. Reserves maintaining wild-managed lions must submit an application to

the provincial authorities requesting a permit. Professional Hunters are obliged to record all completed hunts in a professional hunting register and this register is used to compile provincial reports on the number of lions taken annually. The level of off-take is also evaluated in the management of the meta-population to ensure that only those animals that no longer meet management goals are removed from the population. These animals are typically older lions that have successfully bred and raised several litters of kittens. Most experts consider the recommendation by Packer *et al.* (2011, p. 151) to limit offtake to no more than 1 lion per 2,000 km^2 to be a sustainable offtake of lions. The BMP (pg. 29) has established more restrictive limits for areas of less than 1000 km^2 to not exceed 0.5 lions/1000 km^2.

Utilization: An active lion bone trade from South Africa to several Asian countries for traditional medicinals is primarily supplied from captive-bred lions taken as hunting trophies, as well as captive-bred lionesses and juvenile lions (BMP pg. 30; 2017 NDF pg. 13). Lion bones are being used as a substitute for tiger bones, which is highly valued in Asia, primarily in China and Vietnam (Williams et al. 2015, pg. 1; Gratwicke et al. 2008, pg. 2–5; Graham-Rowe 2011, pg. s101–s102). In 2008, South Africa began issuing CITES permits for the export of skeletons of captive-bred lions to Asia. The number of lion skeletons for which South Africa issued permits for export to Asia (China, Viet Nam, Thailand and Lao PDR) increased tenfold from 2008 to 2011, from about 50 to about 573 skeletons, respectively, representing a total of 1,160 skeletons or about 10.8 metric tons (11.9 US tons) of lion bone in 4 years (Williams 2015, pp. ix–x, 46). With respect to meeting demand for lion bone, Lindsey et al. (2012, p. 20) states that there are likely to be large numbers of lion bones available for export from game farms, from lionesses and non-trophy males, and as byproducts from animals shot as trophies. In addition, Williams et al. (2015, p. 41) reports that there may be between 1,400 and 6,200 lion skeletons from past trophy hunts on South African game farms that could potentially be used to supply demand for lion bone. Further, at the 17th Meeting of the Conference of the Parties, the Appendix II listing for *P. leo* was amended to include an annotation establishing an export quota for lion bones. The annotation states that "[A] zero annual export quota is established for specimens of bones, bone pieces, bone products, claws, skeletons, skulls, and teeth removed from the wild and traded for commercial purposes. Annual export quotas for trade in bones, bone pieces, bone products, claws, skeletons, skulls and teeth for commercial purposes, derived from captive breeding operations in South Africa will be established and communicated annually to the CITES Secretariat." The Service is aware of a press release from the Endangered Wildlife Trust in which they state the DEA has established a quota of 800 skeletons (with or without skulls) of captive-bred lions for international trade, and as of this finding, the CITES website shows that South Africa has communicated a 800 skeleton export quota for 2017 and 2018 to the CITES Secretariat.

While the BMP suggests that the value of bones, whether wild or captive, is not high enough to stimulate the illegal harvest of lions solely to sell the bones into the bone trade, there is the potential that if the value of bones increases due to increasing demand from Asian markets, that captive lions could be a legal source of bones that masks the illegal harvest of wild lions. Additionally, evidence suggests that there may be incentive to poach wild lions for the bone trade. According to Williams et al. (2015, p. x), the 2013 price paid to South African game farmers and landowners for lion bones was $1,260–2,100 USD per skeleton. In many lion range states, this exceeds per capita GDP (gross

domestic product) (World Bank 2015, unpaginated). Thus, the current price paid for lion bone may provide incentive in some countries to poach wild lions. While the lion bone trade appears to currently be based primarily in South Africa's captive lion hunting industry, the trade appears to be having little or no impact on wild lion populations in South Africa at this time—lion populations in South Africa are stable or increasing and there is little poaching of wild lions in the country (Funston and Levendal 2015, pp. 1, 26; Williams et al. 2015, pp. 79–80). However, the impact of the lion bone trade on lion populations outside South Africa is unknown. Based on the effect of the tiger bone trade on tiger populations, if current conditions—for example, rapidly increasing demand and involvement of an international crime syndicate in the lion bone trade (Final listing rule, pg. 80026) —continue unchanged, then there is considerable potential for extensive poaching of wild lions to occur in order to meet demand.

Evaluation:

As stated earlier, the Service has evaluated this application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

While there is habitat available to lions on the national parks and within the smaller, fenced reserves, much of South Africa has been converted into agricultural uses, managed plantation forests, human developments, or extractive industries. With the legalization of private ownership of wildlife in the early 1990s, there has been a significant increase in private land set aside for wildlife. This has led to a boost in South Africa's wildlife, particularly large mammals. South Africa laws, such as ToPS, were put into place to ensure that utilization of this wildlife is sustainable and provides for long-term incentives to maintain these areas for wildlife protection. The national parks and fenced reserves are natural areas surrounded by development. It is only through the on-going management of these remaining natural areas that lions survive in South Africa. South Africa's management of wild and wild-managed lion population as a meta-population, using human intervention (e.g., translocation) as a substitute for natural occurrences (e.g., dispersal), is ensuring that lion populations are genetically healthy and viable.

While it has been stated that South Africa's hunting industry generates $1.1 billion annually, not all of this is connected to lion hunting or to United States hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and a draw for United States hunters, such as Mr. Moroun, to South Africa. Based on the information available to the Service, the presence of private reserves has increased the number and diversity of wildlife in

South Africa, thus fueling the hunting industry, which funds the on-going success of private reserves. It appears that without the hunting industry, these reserves, which have become islands of wilderness surrounded by civilization in much of South Africa, would not be economically viable, and therefore would not exist. Both ToPS and the BMP have put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in South Africa. With an annual harvest of approximately 10 wild-managed lions, South Africa is not exceeding the limits identified in the BMP of 0.5 lions/1,000 sq. km. The objectives of the BMP and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that South Africa has established for managing lions.

Therefore, based on the information available to the Service and seeing that Khamab Kalahari Reserve has been determined by the DEA to maintain a wild lion population, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:</u>

The national management plan, the BMP for lions is extensive and addresses many aspects of lion conservation and management. As reviewed above, the BMP provides a history of the relevant legislation with regards to lion conservation and puts the current efforts into context. The BMP also reviews the species' biology, population status, habitat requirements, and threats to lion populations. Objectives for conservation of the species, as well as a plan to develop a meta-population for wild-managed lions, are also included. Additionally, the monitoring plans have scientifically sound methodologies. Lastly, but equally importantly, are the monitoring and evaluation efforts laid out in the BMP.

In evaluating the information provided by the South African government and other sources, it appears that the hunting program in South Africa is addressing the three main threats identified by the Service when making the determination that the species is threatened with the possibility of extinction. The fenced reserves, including Khamab Kalahari Reserve and national parks are maintaining habitat for lions and ensuring that there is no further habitat loss, provided that the reserves can remain economically viable. In order to maintain a viable population of wild and wild-managed lions, the parks and reserves must maintain biodiversity and a sustainable prey base. Finally, while there is still controversy over the extensive utilization of fencing in South Africa, it does reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions on these reserves and, the limited hunting of lions under this management program contributes to the on-going survival of the species in South Africa.

The off-take of this wild lion provides a direct benefit to the wild populations by helping to support the reserve and manage the local population. Therefore, based on the information available to the

Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, South Africa is closely monitoring and controlling the harvest of wild and wild-managed lions through permitting under ToPS and through the BMP. The issuance of an import permit for a wild lion legally hunted in Khamab Kalahari Reserve under these authorities would not conflict with any programs intended to enhance the survival probably of the species in South Africa.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, wild lions only occur in a limited number of national parks and reserves in South Africa and wild-managed lions are currently found on 45 reserves of less than 1,000 sq. km. While the wild lions on the national parks receive only limited direct management activities, the reserves require management that is more intensive in order to mimic natural biological and ecological roles of lions. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the presence of these national parks and reserves, including Khamab Kalahari Reserve, is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. While the concept of lions behind fences has both benefits and drawbacks, it appears to be a major contributor to the on-going survival of lions in the wild in South Africa. While open and unmanaged habitat not impacted by human intervention would be the ideal conditions for lion populations in South Africa, as well as throughout its natural range, this is not currently a viable option within South Africa.

With limited, controlled off-take of lions as part of the limited management of wild lions, the hunt that Mr. Moroun undertook will contribute to reducing the threat of extinction of lions in South Africa. It appears that the permitting activities under ToPS and the implementation of the BMP will ensure the long-term survival of lions. The utilization of hunters such as Mr. Moroun in managing the populations on these reserves is an important element of the success of lion management in South Africa.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduced the threat of extinction facing lions in South Africa.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions, but particularly captive-bred lions. However, this opposition, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that the legal harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

The oversight by DEA and the implementation of the BMP establishes a framework in which reserves manage their wildlife. The long-term survival of lions, at least in South Africa, is tied directly to the success, both ecologically and economically, of the reserves. The reserves that maintain wild lions and, as part of the management program, carry out very limited hunting, and have the expertise and facilities to maintain lions successfully. This includes Khamab Kalahari Reserve, a population of wild lions.

Therefore, based on the information available to the Service, the applicant hunted on a properly permitted reserve that carries out their management practices in accordance with national and

provincial regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of wild and wild-managed lions within South Africa and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant hunted on a properly licensed reserve that is actively managing lions in a manner that will maintain the species on the reserve.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in South Africa, to Matthew John Moroun, Grossepoint Farms, MI**.

Emma Nelson 3/30/19

Emma Nelson, Biologist
Branch of Permits
Division of Management Authority

Mary Coglitano 8/30/19

Mary Coglitano, Chief
Branch of Permits
Division of Management Authority

REFERENCES:

Bauer, H., Nowell, K., & Packer, C. (2008). Panthera /eo, IUCN 2010. IUCN Red List of Threatened Species. Version 2010.4.

Biodiversity Management Plan for the Lion (Panthera leo) in South Africa (BMP; December 2015): Funston, P. J. & Lavendal, M. (2015). Biodiversity Management Plan for the Lion (Panthera leo) in South Africa. Department of Environmental Affairs, Republic of South Africa. 63 pp

Bjorklund, M. (2003). The risk of inbreeding due to habitat loss in the lion (Panthera leo) Conservation Genetics, 4, 515-523

Cousins, J. A., Sadler, J. P., and Evans, J. (20 l 0). The challenge of regulating private wildli fe ranches for conservation in South Africa. Ecology and Society XX(YY): ZZ. [online] URL: https://www. researchgate.net/profiIe/Jo nathan _Sad le r/pub lication /44854322_The_Challengc_ o(_Regu lat ing_ Pr ivate _ Wil dli fe_Ranches _for_Conservation_in _ So uth _ Afric a/li nks/0c 96051 4ca0b 84f295000000.pdf

Creel, S., Becker, M. S., Durant, S. M., M'soka, J., Matandiko, W., Dickman, A. J., & Stanley Price, M. (2013). Conserving large populations of lions-the argument for fences has holes. Ecology letters.

Crowley, K., and Mokhema, T. (2014). Lions Hunted to Save Rhinos in South African Circle of Life. Bloomberg [online] URL: http://www.b loo mberg.co m/news larticles/2014-08 -19 /lio ns-h untc d- to-preserve-rhinos-in-south-african-circle-of-life

Department of Environmental Affairs, Scientific Authority of South Africa. 2017. Non-detriment Finding Assessment for Pathera leo (African lion). No. 41393.

Dolrenry, S., Stenglein, J., Hazzah, L, Lutz, R.S. and Frank, L. 2014. A Metapopulation approach to African lion (Panthera leo) conservation. PLoS ONE 9(2): e88081. Doi: 10-1371/ joumal.pone.0088081.

Ferreira, S.M. and Hofineyr, M. 2014. Managing charismatic carnivores in small areas: large felids in South Africa. South African Journal of Wildlife Research 44(l):32-42.

Graham-Rowe, D. (2011). Endangered and in demand . Nature 480 (22 December 201 l): st 01-s103.

Gratwicke, B., Mills, J., Dutton, A., Gabriel, G., Long, B., Seidensticker, J., Wright, B., You, W. & Zhang, L. (2008). Attitudes toward consumption and conservat io n of tigers in China. PLoS ONE 3 (7): e2544.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Ricke lton, M., Walker, C., Slotow, R. and Skinner, J.D. (2007). Restoring lions Panthera leo to northern KwaZulu-Nata l, So uth Africa: short- term biological and technical success but equivocal long-telTil conservation. Oryx 41: 196-200.

IUCN Species Survival Commission (2012). Guiding Principles o n Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0. IUCN SSC 2012.

IUCN Species Survival Commission (SSC) Cat Specialist Group. (2006a). Regional Conservatio n Strategy For The Lion Panthera leo In Eastern and Southern Africa. 60 pp.

Kettles, R. and Slotow, R. (2009). Management of free-ranging lions on an enclosed game reserve. South African Journal of Wildlife Research 39:23-33.

Lindsey, P., Alexander, R., Balme, G.A., Midlane, N. & Craig, J. (2012b). Possible relationships between the South African captive-bred hunting industry and the hunting and conservation oflions elsewhere in Africa. South African Journal of Wildlife Research 42 (1), 11-22.

Miller, S.M., Bissett, C., Burger, A., Courtney, B. and Dickerson, T. (2013). Management of reintroduced lions in small, fenced reserves in South Africa: an assessment and best practice guidelines. South African Journal ofWildlife Research 43(3):138-154.

Miller, S.M and Funston, P.J. (2014) Population growth rates oflions (Panthera leo) on small fenced reserves in South Africa: a management dilemma. South Africa Journal of Wil dlife Research 44:43-55.

Oliveier, P.J., Van Aarde, R.J., and Ferreira, S.M. (2009) Support for a metapopulation structure among mammals. Mammal Review 39:178-192.

Packer, C., Brink, H., Kissui, 8. M., Maliti, H., Kushn ir, H., and Caro, T. (2011) Effects of trophy hunting on lions and leopards in Tanzania. Conservation Biology. 25:142-153.

Packer, C., Swanson, A., Canney, S., Loveridge, A., Garnett, S., Pfeife r, M., ... MacNulty, D. (2013). The case for fencing rema ins intact. Ecology Letters 16 : 1414-e4.

Riggio, J., Jacobson, A., Dollar, L., Bauer, H., Becker, M., Dickman, A., ... Pimm, S. (2013) . The size of savannah Africa: a lion ' s (Panthera leo) view. Biodiversity and Conse, n ation, 22(1), 17-35.

Slotow, R. and Hunter, L.T.8. (2009) Reintroduction decisions taken at the incorrect social scale devalue their conservation contribution: the African lion in South Africa. in: M.W. Hayward and M.J. Somer (eds). Reintroduction of Top-Order Predators. pp. 41-73. Wiley-Blackwell, Oxford.

South Africa (2004). National Environmental Management Biodiversity Act 10 of 2004. www.gpwonline.co.za

Tambling, CJ. and du Toit, S.T. (2005) Modelling wildebeest population dynamics: Implications of predation and harvesting in a closed system. Journal of Applied Ecology 42:431-441.

Trinkel, M., Ferguson, N, Reid, A., Reid, C., Somers, M. et al. (2008) Translocating lions into an inbred lion population in the Hluhluwe iMfolozi Park, South Africa. Animal Conservation 11:138-143.

Tinkel, M., Funston, P., Hofineyr, M., Hofineyr, D., Dell, S., Parker, C., and Slotow, R. (2010) Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13:374-382.

USFWS (2015) Final ESA listing rule for Panthera lea leo and P. I. melanochaita. 80 Fed. Reg. 79999.

Williams, V.L., Newton, DJ., Loveridge, A.J., & Macdonald, D.W. (2015). Bones of Contention: An Assessment of the South African Trade in African Lion Panthera leo Bones and Other Body Parts. TRAFFIC, Cambridge, UK & WildCRU, Oxford, UK.

World Bank. 2015. The World Bank Annual Report 2015. Washington, DC. © World Bank. https://openknowledge.worldbank.or g/handle/10986 /22550 License: CC BY 3.0 IGO.

Under provisions of section 7(a)(2) of the Endangered Species Act, a Federal agency that permits, licenses, funds, or otherwise authorizes activities must consult with the Fish and Wildlife Service as appropriate, **to ensure that its actions will not jeopardize the continued existence of any listed species.**

The Act states that each federal agency shall insure that any action authorized ... **"is not likely to jeopardize the continued existence of any endangered species or threatened species** *OR* result in the destruction or adverse modification of habitat of such species which is determined ...to be critical...."

Intra-Service Section 7 Biological Evaluation under ESA
Division of Management Authority

Originator: Emma Nelson
Date: August 13, 2019
Application Number: 82926C

I. Listed species and critical habitat (if any) potentially affected:

The applicant requests a permit to import one female sport hunted lion trophy (*Panthera leo melanochaita)* taken within Khamab Kalahari Reserve, North West, South Africa during the 2018 hunting season for the purpose of enhancement of the species.

Scientific name:
Panthera leo melanochaita

Common name:
African lion

Date listed:
12/23/2015- T

Description of species, threats, and critical habitat:
The lion has a broad habitat tolerance, absent only from tropical rainforest and the interior of the Sahara desert. There are records of lions to elevations of more than 4,000 m in the Bale Mountains and on Kilimanjaro. Although lions drink regularly when water is available, they are capable of obtaining their moisture requirements from prey and even plants (such as the tsama melon in the Kalahari desert), and thus can survive in very arid environments. Medium- to large-sized ungulates (including antelopes, zebra and wildebeest) are the bulk of their prey, but lions will take almost any animal, from rodents to a rhino. They also scavenge, displacing other predators (such as the spotted hyaena) from their kills.

Lions are the most social of the cats, with related females remaining together in prides, and related and unrelated males forming coalitions competing for tenure over prides. Average pride size (including males and females) is four to six adults; prides generally break into smaller groups when hunting. Lions tend to live at higher densities than most other felids, but with a wide variation from 1.5 adults per 100 km² in southern African semi-desert to 55/100 km² in parts of the Serengeti. Pride ranges can vary widely even in the same region: e.g., from 266-4,532 km² in the Kgalagadi Transfrontier Park of South Africa.

The main threats to lions are indiscriminate killing (primarily as a result of retaliatory or pre-emptive killing to protect human life and livestock), prey base depletion, habitat loss, illegal trade in lion parts, trophy hunting (depending on management), and disease. Habitat loss and

conversion has led to a number of subpopulations becoming small and isolated. Furthermore, trophy hunting has a net positive impact in a some areas, but may have at times contributed to population declines in Botswana, Namibia, Tanzania, Zimbabwe, Cameroon and Zambia.

The economic impact of stock raiding can be significant and therefore lions are persecuted intensely in livestock areas across Africa; their scavenging behavior makes them particularly vulnerable to poisoned carcasses put out to eliminate predators. Little actual information exists on the number of lions killed as problem animals by local people, even though this is considered the primary threat to their survival outside protected areas.

Lion population density across the species' range is known to track the biomass of large wild herbivores, the lion's principle prey species. These species are increasingly under threat from an unsustainable and increasingly commercialized bushmeat trade, leading to collapses in prey populations across large parts of savanna Africa.

Illegal trade in lion body parts for medicinal purposes is considered a threat to African lion subpopulations (according to the regional lion conservation strategies, which call on countries to prohibit and control trade in lion bone and other parts and products) as well as to the small subpopulation in India's Gir Forest. In West and Central Africa, there are many reported uses for lion skins and bone in Benin (with fat and bones being most commonly utilized), and a survey carried out around Nigeria's Yankari National Park found more than 22 lion parts considered to be of medicinal value, with most of the over 200 interviewees saying they had used lion parts in the past, and half within the past three years. The widespread prevalence of fakes in the traditional medicinal market is indicative of a continued demand. While fakes may replace items in the market that otherwise would be illegally sourced from the wild, they could perpetuate demand and poaching when consumers aspire to the genuine wild item rather than making a conscious choice of an (often cheaper) alternative.

There appears to be increasing interest in the use of African lion bone in Asia. There is no history of lion bone being used in traditional medicine there, but China has permitted the use of bones from captive lions to make medicinal wines traditionally containing tiger bone. South Africa has reported the export of large quantities of lion bone sourced from captive animals to China, the Lao People's Democratic Republic and Viet Nam. Legal international trade in bone reported as from captive-bred lions could serve as a cover for illegally wild-sourced lion (and other big cat) parts. There is also concern that wild lion parts from eastern and Southern Africa could be drawn into the large illegal wildlife trade to Asia centered around elephant ivory.

Trophy hunting is carried out in a number of sub-Saharan African countries and is considered an important management tool for conserving wild land providing financial resource for lion conservation for both governments and local communities. However, there is concern that management regimes have not always been sufficient to deter unsustainable offtakes. A sustainable offtake level of one male lion per 2,000 km^2 has been recommended, but offtake has been higher in many areas, which suggests that it is potentially a threat. Trophy hunting can thus be a tool for conservation but also a threat, depending on how it is regulated and managed. Hunter et al. (2013) cautioned that regulatory measures which reduce the profitability of lion trophy hunting could have widespread negative impacts for wildlife-based land use, anti-poaching and tolerance of lion outside protected areas.

No critical habitat has been designated.

II. Geographic area where action will occur:

Khamab Kalahari Reserve, North West, South Africa

III. Description of the proposed action:

The applicant requests a permit to import one female sport hunted lion trophy (*Panthera leo melanochaita)* taken within Khamab Kalahari Reserve, North West, South Africa during the 2018 hunting season for the purpose of enhancement of the species.

IV. Determination of effects:

A. Explanation of effects of the action on species and critical habitat in item I:

The import of the sport-hunted trophy will have no effect.

B. Explanation of actions to be implemented to reduce adverse effects:

The action will have no effect.

V. Effect of determination and response requested:

A. Determination

No effect.
Species: African lion (*Panthera leo melanochaita*)

Prepared by

Emma Nelson 8/13/19

Emma Nelson, Biologist — Date
Division of Management Authority

Concurrence

Mary Coffman 8/30/19

Chief — Date
Division of Management Authority

Research:

Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2016. *Panthera leo* (errata version published in 2017). *The IUCN Red List of Threatened Species* 2016: e.T15951A115130419. http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T15951A107265605.en. Downloaded on 13 August 2019.

LION SOUTH AFRICAN ESA TROPHY

Permit Number: MA82926C-0

Effective: 08/30/2019 Expires: 08/29/2020

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Ellen Williams

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

MATTHEW JOHN MOROUN
(b)(6) [redacted]
GROSSE POINT FARMS, MI 48236
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539(a); 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one female African lion (*Panthera leo melanochaita*), taken in South Africa for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2018 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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January 26, 2016

Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dear Chief Van Norman:

RCVD JAN 28 2016

Enclosed please find four applications for permits authorizing the import of sport-hunted trophies of *P. l. melanochaita* from Zimbabwe. In evaluating these applications, please consider the information on lion conservation and management in Bubye Valley Conservancy, Save Valley Conservancy, and Zimbabwe on the whole already submitted by Conservation Force and others. An index of this information is attached to this letter.

The information submitted by Conservation Force demonstrates that the lion conservation and management program in Zimbabwe, and specifically in Bubye Valley and Save Valley Conservancies, enhances the survival of the species because it addresses the three main threats to lion: (1) loss of habitat, (2) loss of prey base, and (3) human-lion conflict, and more.

First, the information demonstrates that habitat would not otherwise exist for lion in Bubye Valley and Save Valley Conservancies but for the income generated by tourist safari hunting. Both conservancies rely on the income from tourist safari hunting to fund their operations. If hunting stopped, the 1.7 million acres of habitat protected in these conservancies are likely to be lost to the lion, rhino, and prey species.

Second, Bubye Valley and Save Valley Conservancies each engage in extensive anti-poaching operations that protect the lion's prey base. For example, in 2015, Bubye Valley Conservancy spent $590,000 on game scouts and anti-poaching. All of these funds were generated by tourist safari hunting.

Finally, the information shows the significant community assistance programs in place in each of these conservancies. Bubye Valley Conservancy and Save Valley Conservancy each contribute $100,000 annually to local communities in cash, services, game meat, and supplies. This support is used to build schools and clinics, maintain water infrastructure, assist with repairs and maintenance of equipment, fund school books and field trips, increase consumption of protein, and otherwise improve the quality of life for local residents. Because of these benefits, local people are more willing to tolerate lion, and human-lion conflicts are reduced.

We believe the information already in the Fish and Wildlife Service's possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. However, we will continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III on behalf of
Conservation Force

3240 S 1-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

Enclosures:

- Application submitted on behalf of Steven Chancellor for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Application submitted on behalf of Kent Greenawalt for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Application submitted on behalf of James Horrocks for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Application submitted on behalf of Jeffrey Smithers for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Index of Documents Submitted

NEW INFORMATION ON THE AFRICAN LION

INDEX FOR: ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (Panthera leo) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Bubye Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie (Mazunga Safaris), Email re: Community Assistance Program in BVC (Jan. 20, 2016)	1/26/16
5	Blondie (Mazunga Safaris), BVC – Spreadsheet, Community Assistance 2011 & 2012	1/26/16
6	Zig, Photos of BVC Community Assistance Program	1/26/176
7	ZPHGA, Info on Lion Age Restrictions (Jan. 20, 2016)	1/25/16 Louis M 1/26/16 Us
8	Dr. Byron du Preez et al., Sport Hunting and Lion (Panthera leo) Conservation in Zimbabwe (Jan. 22, 2016)	1/26/16
9	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD JAN 28 2016

LP

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA) Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Smithers	Jeffrey	Davis	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)	(b) (6)	(b) (6)	

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)	(b) (6)	(b) (6)	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
San Antonio	Texas	78258	Bexar	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 12US75980A/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Signature of individual responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 01/20/2016

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      P. l. melanochaita (African lion)

   b. Sex (if known).

      Male

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      Zimbabwe: Bubye Valley Conservancy, Beit Bridge District, Matabeleland South. Nearest town is Beit Bridge and nearest city is Bulawayo. GPS coordinates for Towla are S 2126478 , E 02953162. Hunting area is a wildlife conservancy of 850,000 acres.

   b. Date wildlife is to be hunted:

      May 2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      All parts including skin, skull, teeth, and claws

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

      N/A

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Steve Colletts
Business Name:	
Address:	15 Josiah Chinamano Road
Address:	
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information already provided by Conservation Force, Pete Fick/Bubye Valley Conservancy, and Zimbabwe authorities.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported

(b) (6)

Applicant's signature _____ Date: 01/20/2016

Be aware that there may be approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
    John J. Jackson, III or Regina Lennox of Conservation Force
    504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Sign (b) (6)

Name: JEFF SMITHERS

Date: 01/20/16

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez[†1], Dr Rosemary Groom[‡2], Olivia Mufute[§3] and Roseline Mandisodza-Chikerema[¶3]

[1]Bubye Valley Conservation Research Initiative
[2]African Wildlife Conservation Fund
[3]Zimbabwe Parks and Wildlife Management Authority

January 31, 2016

*
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‡ rosemary@africanwildlifeconservationfund.org
§ omufute@zimparks.co.zw
¶ mandisodzar@gmail.com

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Summary of Steps Taken by Zimbabwe to Improve the Management of Lion Sport-Hunting

i – Banning of all lioness hunting in Zimbabwe
ii – Hunting moratoria around the Gonarezhou and Hwange National Parks
iii – Removal of fixed hunting quotas
iv – Age restrictions on sport-hunted lions
v – Scientifically-based adaptive quota management system

Summary of Lion Sport-Hunting's Contribution to Conservation

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
ii – Lion sport-hunting generates up to US$ 557 km^{-2}
iii – Anti-poaching (in particular that of rhinoceroses) costs ∼US$ 216 km^{-2}

Introduction

The United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

Lions – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

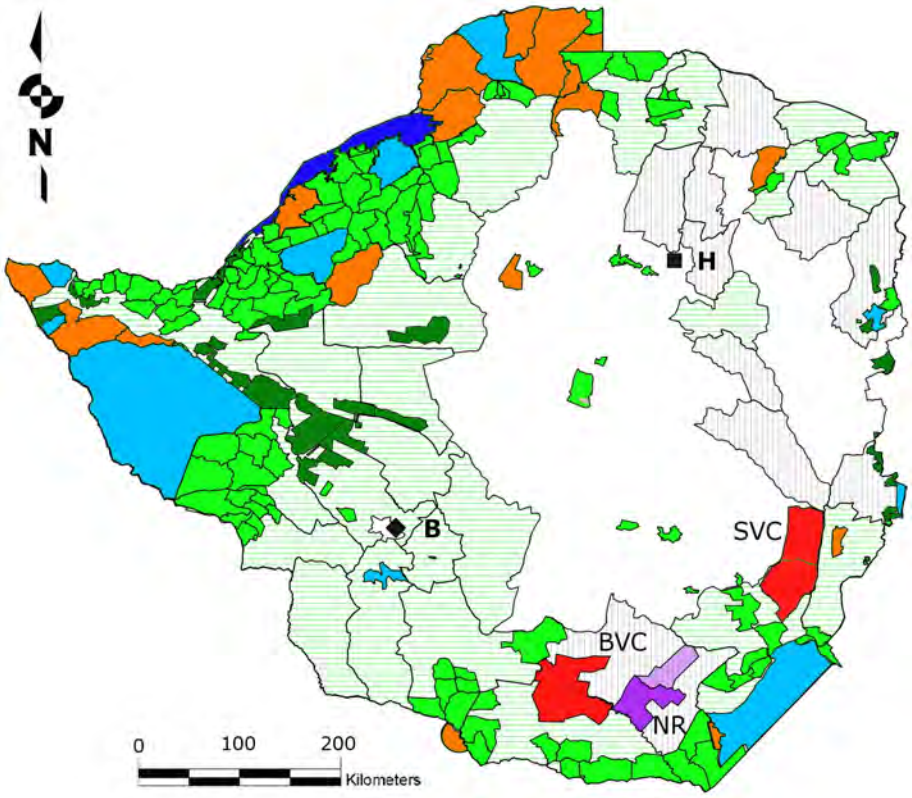

Figure 3: Map of Zimbabwe's main wildlife areas: [*i*] National Parks are represented in light blue; [*ii*] Safari areas are represented in orange; [*iii*] Forestry areas are represented in dark green; [*iv*] Community and Private wildlife areas are represented in light green; [*v*] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [*vi*] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [*vii*] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [*viii*]The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [*ix*] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: *ii*, *iii*, *iv*, *v*, *vii* & *viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

Conservation and Sport-Hunting

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

Zimbabwe's Adaptive Lion Quota Management System

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately \$150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

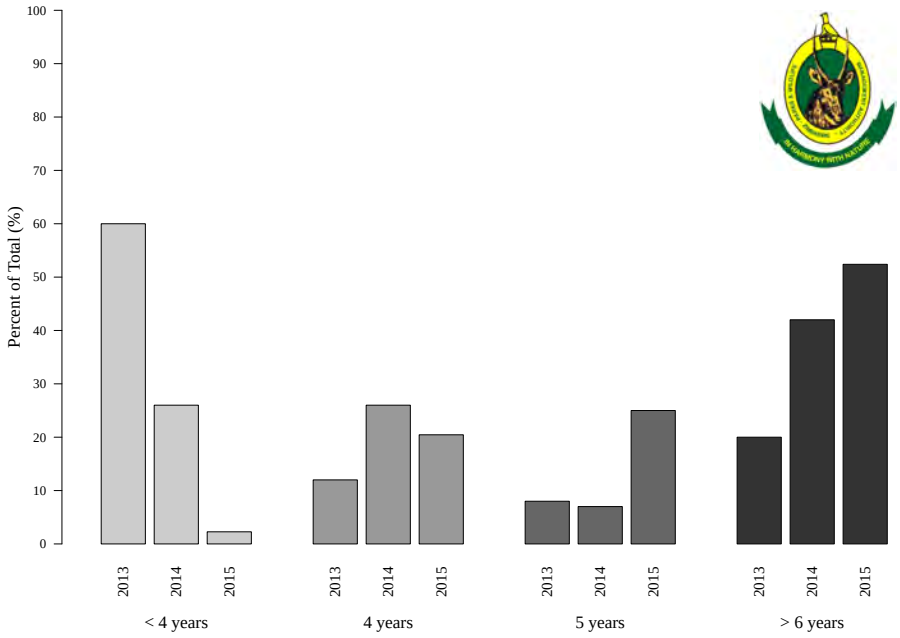

Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

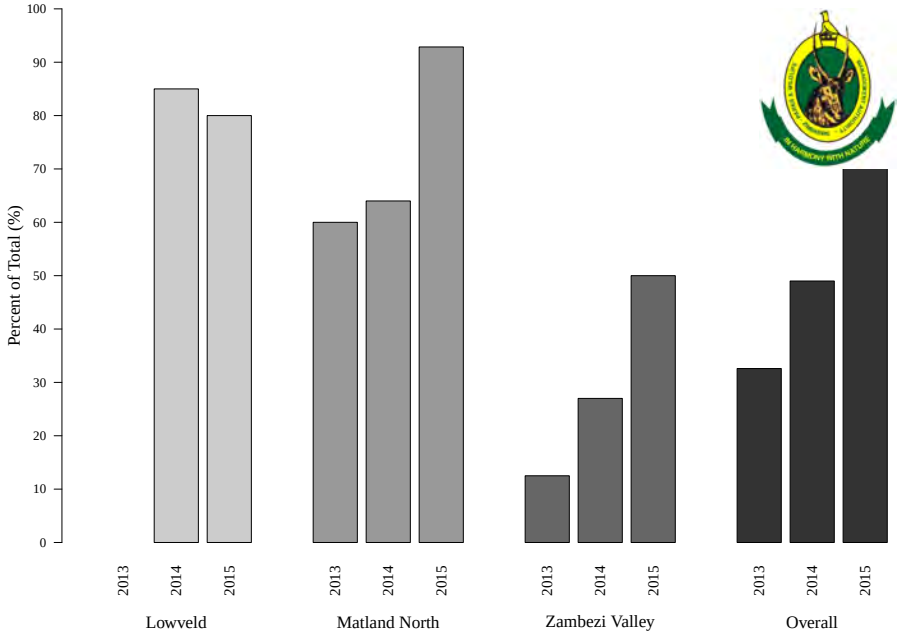

Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

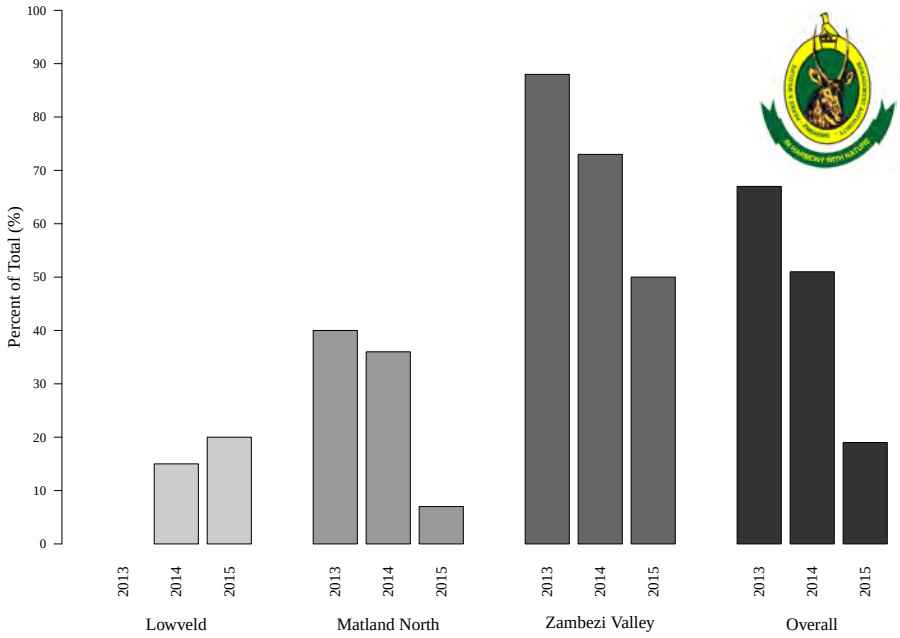

Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	*People Injured*	*People Killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	**44**	**183**	***2***	***7***

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

The Bubye Valley Conservancy

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (∼0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

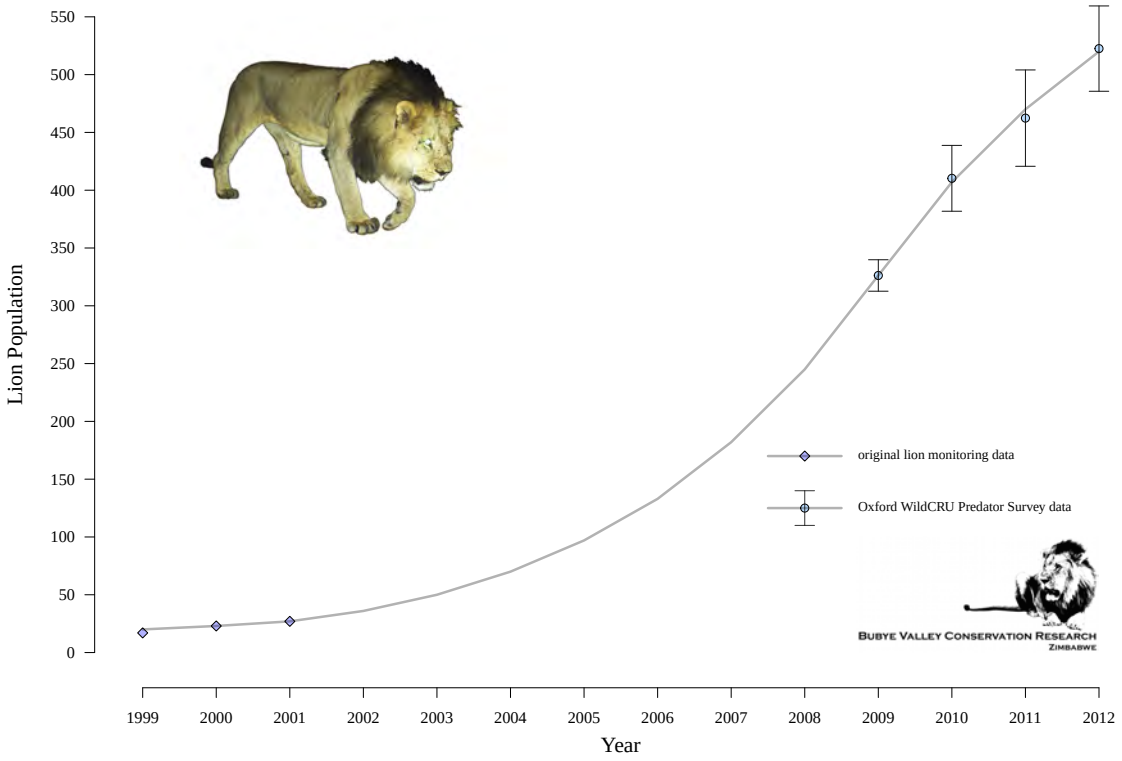

Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water* - Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.* - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand errected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Beit Bridge RDC self funding projects up and running* - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange - Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Beit Bridge & Mwenezi districts* - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs andlocal headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations* - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports* - Transport the soccor teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions* - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC* - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b/holes in the Vumhani area are done by BVC* - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project* - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School - Supply of 24 loads of riversand to Mdzwiti School (value $1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

The Savé Valley Conservancy

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

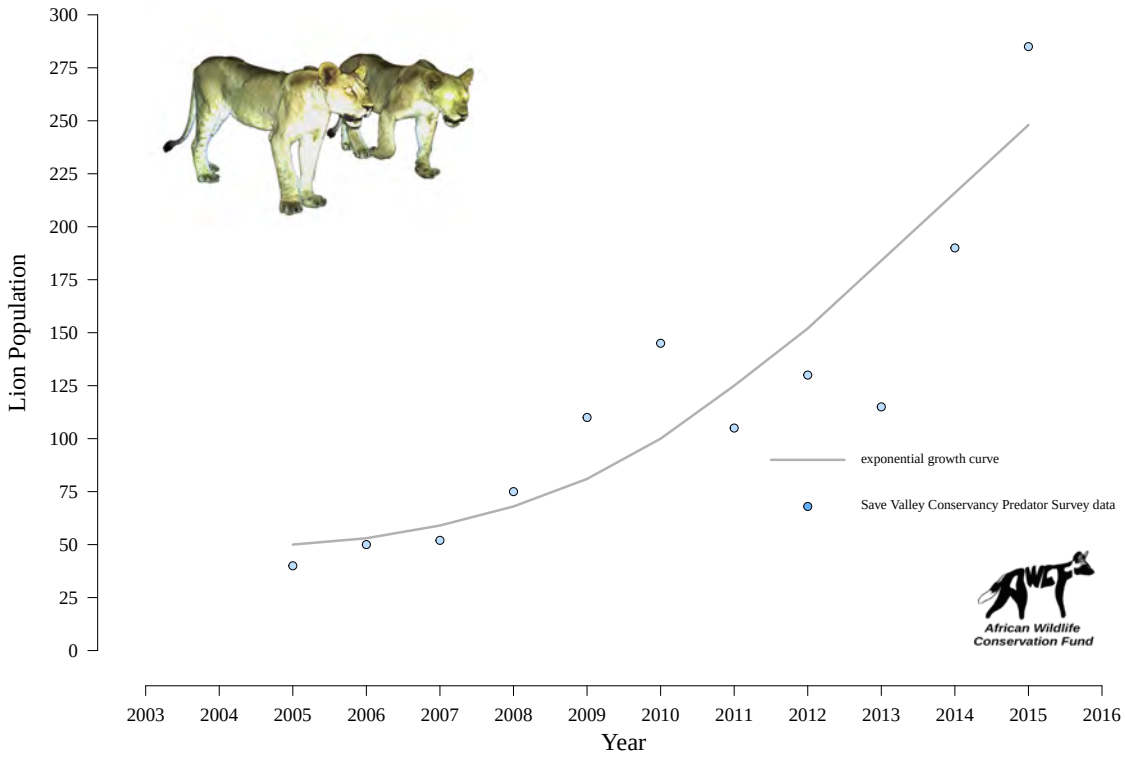

Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

The Pros and Cons of Conserving Lions

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

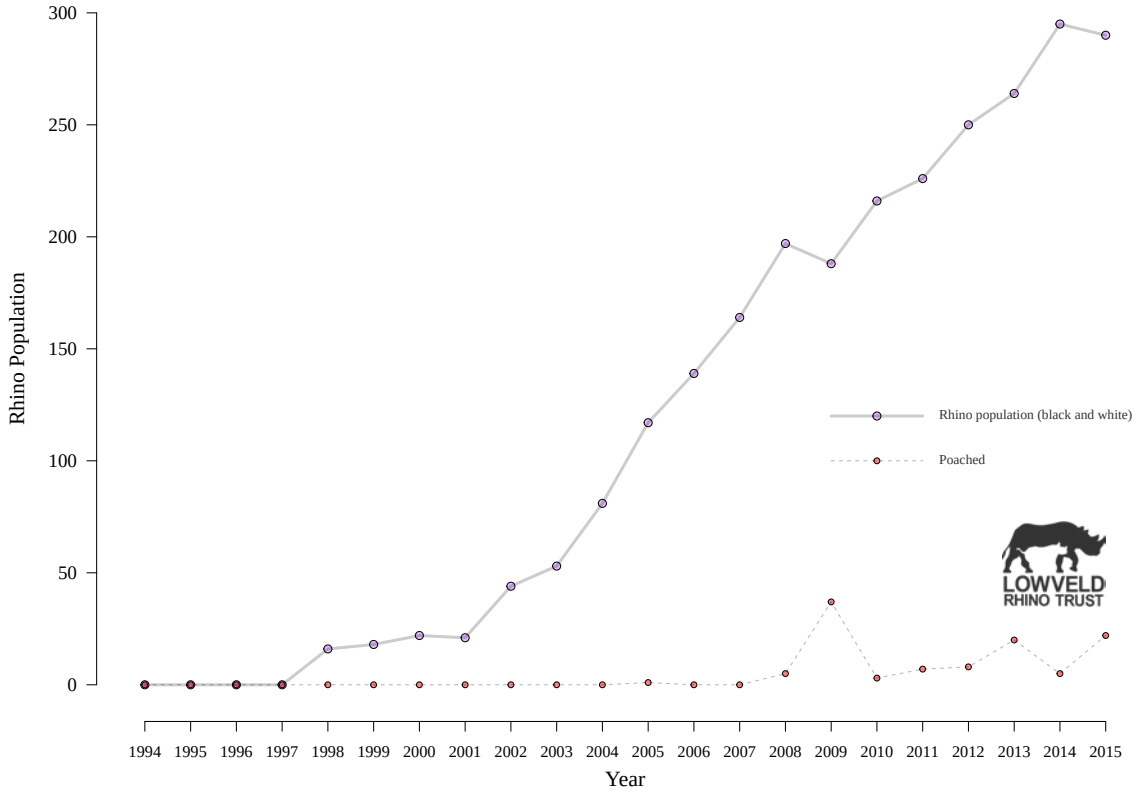

Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

Where the Money Goes: The Finances of Lion Sport-Hunting and Reinvestment in their Conservation

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration: 18 days [*total daily rate of US$ 53,100 lion hunt^{-1}*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion hunt^{-1}*]

Bubye Valley Conservancy - Lion Sport-Hunting Revenue Generated (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 year^{-1}), research (approximately US$ 34,700 year^{-1} not including client and sponsor donations), and community support assistance (approximately US$ 210,000 year^{-1}).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

Discussion

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZP-WMA, and that the research assists ZP-WMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

Conclusion

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

References

Barnett, R., Yamaguchi, N., Shapiro, B., Ho, S.Y., Barnes, I., Sabin, R., Werdelin, L., Cuisin, J., Larson, G., 2014. Revealing the maternal demographic history of Panthera leo using ancient DNA and a spatially explicit genealogical analysis. Bmc Evolutionary Biology 14.

Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Hunter, L., Macdonald, D., Packer, C., 2015a. Lion (Panthera leo) populations are declining rapidly across Africa, except in intensively managed areas. Proceedings of the National Academy of Sciences of the United States of America-Biological Sciences 10.

Bauer, H., Packer, C., Funston, P.F., Henschel, P., Nowell, K., 2015b. Panthera leo. The IUCN Red List of Threatened Species 2015.

Bauer, H., Van Der Merwe, S., 2004. Inventory of free-ranging lions Panthera leo in Africa. Oryx 38, 26-31.

Becker, M., McRobb, R., Watson, F., Droge, E., Kanyembo, B., Murdoch, J., Kakumbi, C., 2013. Evaluating wire-snare poaching trends and the impacts of by-catch on elephants and large carnivores. Biological Conservation 158, 26-36.

Bond, I., 1993. The economics of wildlife and landuse in Zimbabwe: An examination of current knowledge and issues. WWF Multispecies Project Paper No 36, Worldwide Fund for Nature, Harare, Zimbabwe.

Brassine, M.C., Parker, D.M., 2012. Does the presence of large predators affect the diet of a mesopredator? African Journal of Ecology 50, 243-246.

Child, B., 1988. The role of wildlife utilization in the sustainable economic development of semi-arid rangelands in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

Child, B., 1993. Using wildlife as a development tool in Zimbabwe.

Creel, S., 2001. Four factors modifying the effect of competition on carnivore population dynamics as illustrated by African wild dogs. Conservation Biology 15, 271-274.

Creel, S., Creel, N.M., 1996. Limitation of African wild dogs by competition with larger carnivores. Conservation Biology 10, 526-538.

Creel, S., Creel, N.M., 1997. Lion density and population structure in the Selous Game Reserve: Evaluation of hunting quotas and offtake. African Journal of Ecology 35, 83-93.

Cumming, D.H.M., 1993. Multi-species systems: Progress, prospects and challenges in sustaining range animal production and biodiversity in East and southern Africa. In Proceedings VII World Conference on Animal Production, Edmonton, Alberta, Canada

Davidson, Z., 2009. Lion ecology and socio-spatial impacts of trophy hunting in Zimbabwe. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Preez, B., Hart, T., Loveridge, A.J., Macdonald, D.W., 2015. Impact of risk on animal behaviour and habitat transition probabilities. Animal Behaviour 100, 22-37.

du Preez, B.D., 2014. The impact of intraguild competition with lion Panthera leo on leopard Panthera pardus behavioural ecology. D.Phil. Thesis, University of Oxford, Oxford, UK.

du Toit, R., 1989. Proposal for Savé Valley Conservancy. Unpublished report for the Intensive Conservation Areas Committee, October 1989, Harare, Zimbabwe

Durant, S.M., 1998. Competition refuges and coexistence: an example from Serengeti carnivores. Journal of Animal Ecology 67, 370-386.

Durant, S.M., 2000. Living with the enemy: avoidance of hyenas and lions by cheetahs in the Serengeti. Behavioral Ecology 11, 624-632.

Funston, P.J., 2008. Conservation and management of lions in Southern Africa: status, threats, utilization and the restoration option, In Management and conservation of large carnivores

in West and Central Africa. eds B. Croes, H.H. Delongh, H. Bauer, pp. 109-131. Leiden, Institute of Environmental Sciences.

Funston, P.J., 2011. The Savé Valley Conservancy Lion Management Plan, 2011. Report for the Savé Valley Conservancy.

Funston, P.J., Groom, R.J., Lindsey, P.A., 2013. Insights into the Management of Large Carnivores for Profitable Wildlife-Based Land Uses in African Savannas. Plos One 8.

Groom, R.J., P., W.J., 2015. Carnivore densities in the Savé Valley Conservancy: 2015. Report for the Savé Valley Conservancy.

Hayward, M.W., O'Brein, J., Kerley, G.I.H., 2007. Carrying capacity of large African predators: predictions and tests. Biological Conservation 139, 219-229.

Hunter, L.T.B., Pretorius, K., Carlisle, L.C., Rickelton, M., Walker, C., Slotow, R., Skinner, J.D., 2007. Restoring lions Panthera leo to northern KwaZulu-Natal, South Africa: short-term biological and technical success but equivocal long-term conservation. Oryx 41, 196-204.

IUCN, 2006. Conservation strategy for the lion in eastern and southern Africa. IUCN SSC Cat Specialist Group, Gland, Switzerland and Cambridge, UK.

IUCN, 2015. The IUCN Red List of Threatened Species. Version 2015-4.

Jansen, D.J., Child, B., Bond, I., 1992. Cattle, wildlife, both or neither: Results of a financial and economic survey of commercial ranches in southern Zimbabwe. WWF Multispecies Project Paper No 27, Worldwide Fund for Nature, Harare, Zimbabwe.

Kettles, R., Slotow, R., 2009. Management of free-ranging lions on an enclosed game reserve. South African Journal of Wildlife Research 39, 23-33.

Laurenson, M.K., Wielebnowski, N., Caro, T.M., 1995. Extrinsic Factors and Juvenile Mortality in Cheetahs. Conservation Biology 9, 1329-1331.

Leader-Williams, N., Milledge, S., Adcock, K., Brooks, M., Conway, A., Knight, M., Mainka, S., Martin, E.B., Teferi, T., 2005. Trophy hunting of black rhino Diceros bicornis: Proposals to ensure is future sustainability. Journal of International Wildlife Law & Policy and Politics 8, 1-11.

Lindsey, P., du Toit, R., Pole, A., Romanach, S., 2008. Savé Valley Conservancy: a large scale African experiment in cooperative wildlife management. Chapter 11, pages 163-184 in B. Child, H. Suich and A. Spenceley, "Evolution and innovation in wildlife conservation in southern Africa." Earthscan, London.

Lindsey, P.A., Alexander, R., Frank, L.G., Mathieson, A., Romanach, S.S., 2006. Potential of trophy hunting to create incentives for wildlife conservation in Africa where alternative wildlife-based land uses may not be viable. Animal Conservation 9, 283-291.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Balme, G.A., Funston, P.J., Henschel, P.H., Hunter, L.T.B., 2015. Life after Cecil: channelling global outrage into funding for conservation in Africa. Conservation Letters 0, 1-6.

Lindsey, P.A., Balme, G.A., Booth, V.R., Midlane, N., 2012. The Significance of African Lions for the Financial Viability of Trophy Hunting and the Maintenance of Wild Land. Plos One 7.

Lindsey, P.A., Romanach, S.S., Davies-Mostert, H.T., 2009. The importance of conservancies for enhancing the value of game ranch land for large mammal conservation in southern Africa. Journal of Zoology 277, 99-105.

Lindsey, P.A., Romanach, S.S., Tambling, C.J., Chartier, K., Groom, R., 2011. Ecological and financial impacts of illegal bushmeat trade in Zimbabwe. Oryx 45, 96-111.

Lindsey, P.A., Roulet, P.A., Romanach, S.S., 2007. Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa. Biological Conservation 134, 455-469.

Loveridge, A.J., Searle, A.W., Murindagomo, F., Macdonald, D.W., 2007. The impact of sport-hunting on the population dynamics of an African lion population in a protected area. Biological Conservation 134, 548-558.

Macdonald, D.W., Loveridge, A.J., Nowell, K., 2010. Dramatis personae: an introduction to the wild felids, In Biology and Conservation of Wild Felids. eds D.W. Macdonald, A.J. Loveridge, pp. 3-58. Oxford University Press Inc., New York, United States.

Miller, S.M., Funston, P.J., 2014. Rapid growth rates of lion (Panthera leo) populations in small, fenced reserves in South Africa: a management dilemma. South African Journal of Wildlife Research 43, 1-13.

Mills, M.G.L., 1995. Notes on wild dog Lycaon pictus and lion Panthera leo population trends during a drought in the Kruger National Park. Koedoe 38, 95-99.

Mosser, A., Packer, C., 2009. Group territoriality and the benefits of sociality in the African lion, Panthera leo. Animal Behaviour 78, 359-370.

Nowell, K., Jackson, P., 1996. Leopard, Panthera pardus, In Wild Cats: Status Survey and Conservation Action Plan. p. 406. IUCN, Switzerland.

Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., Caro, T., 2010. Effects of Trophy Hunting on Lion and Leopard Populations in Tanzania. Conservation Biology 25, 142-153.

Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., Nowell, K., 2009. Sport Hunting, Predator Control and Conservation of Large Carnivores. Plos One 4.

Packer, C., Loveridge, A., Canney, S., Caro, T., Garnett, S.T., Pfeifer, M., Zander, K.K., Swanson, A., MacNulty, D., Balme, G., Bauer, H., Begg, C.M., Begg, K.S., Bhalla, S., Bissett, C., Bodasing, T., Brink, H., Burger, A., Burton, A.C., Clegg, B., Dell, S., Delsink, A., Dickerson, T., Dloniak, S.M., Druce, D., Frank, L., Funston, P., Gichohi, N., Groom, R., Hanekom, C., Heath, B., Hunter, L., DeIongh, H.H., Joubert, C.J., Kasiki, S.M., Kissui, B., Knocker, W., Leathem, B., Lindsey, P.A., Maclennan, S.D., McNutt, J.W., Miller, S.M., Naylor, S., Nel, P., Ng'weno, C., Nicholls, K., Ogutu, J.O., Okot-Omoya, E., Patterson, B.D., Plumptre, A., Salerno, J., Skinner, K., Slotow, R., Sogbohossou, E.A., Stratford, K.J., Winterbach, C., Winterbach, H., Polasky, S., 2013. Conserving large carnivores: dollars and fence. Ecol Lett 16, 635-641.

Pole, A., 1999. The behaviour and ecology of African wild dogs, Lycaon pictus, in an environment with reduced competitor density. PhD thesis, University of Aberdeen, Aberdeen, Scotland.

Pusey, A.E., Packer, C., 1987. The Evolution of Sex-Biased Dispersal in Lions. Behaviour 101, 275-310.

Schaller, G.B., 1972. The Serengeti Lion: A Study of Predator-Prey Relations. University of Chicago Press.

Smuts, G.L., 1978. Effects of Population Reduction on Travels and Reproduction of Lions in Kruger National Park. Carnivore 1, 61 - 72.

Spong, G., 2002. Space use in lions, Panthera leo, in the Selous Game Reserve: social and ecological factors. Behavioral Ecology and Sociobiology 52, 303-307.

Suzuki, Y., 2001. Drifting Rhinos and Fluid Properties: The Turn to Wildlife Production in Western Zimbabwe. Journal of Agrarian Change 1, 600-625.

Trinkel, M., Funston, P., Hofmeyr, M., Hofmeyr, D., Dell, S., Packer, C., Slotow, R., 2010. Inbreeding and density-dependent population growth in a small, isolated lion population. Animal Conservation 13, 374-382.

Vucetich, J.A., Creel, S., 1999. Ecological interactions, social organization, and extinction risk in African wild dogs. Conservation Biology 13, 1172-1182.

Wegge, P., Odden, M., Pokharel, C.P., Storaas, T., 2009. Predator-prey relationships and responses of ungulates and their predators to the establishment of protected areas: A case study of tigers, leopards and their prey in Bardia National Park, Nepal. Biological Conservation 142, 189-202.

Whitman, K., Starfield, A.M., Quadling, H.S., Packer, C., 2004. Sustainable trophy hunting of African lions. Nature 428, 175-178.

Williams, P.H., Burgess, N.D., Rahbek, C., 2000. Flagship species, ecological complementary and conserving the diversity of mammals and birds in sub-Saharan Africa (vol 3, part 3, pg 258, 2000). Animal Conservation 3, 365-365.

ZPWMA, 2015. Conservation Status of the African Lion (Panthera leo) in Zimbabwe. Unpublished Report for the USFWS.

LION ZIMBABWE ESA TROPHY

Permit Number: MA86472B-0

Effective: 10/19/2017 Expires: 10/18/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JEFFREY DAVIS SMITHERS
(b) (6)
SAN ANTONIO, TX 78258
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r)

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD NOV 8 2018

To whom it may concern:

We are writing to explain the tardiness of Jeff Smithers' permit application and payment that was due on October 17, 2018. Please review the information provided and process the permit application without penalties or extra charges.

We were originally instructed to mail the application and payment to the Office of Law Enforcement in the Texas region, which as per Form 3-200-52 is Region 2 with a mailing address of 2545 W Frye Rd, Suite 8, Chandler, AZ 85224-6273. The application and payment were set via FedEx priority overnight on Tuesday October 16, 2018. FedEx tried to deliver the package on Wednesday October 17, 2018 at 9:52am, but were unable to deliver with the exception "customer not available or business closed". On Thursday October 18, 2018 we called the Office of Law Enforcement locate in Chandler AZ which went to a voicemail stating that this location no longer handles permit/license questions and that we would need to contact the Sacramento location. At that time we recalled the package with FedEx and would not get it back until Friday October 19, 2018.

Once we received the package containing the permit application and payment we reached out to the Sacramento, CA office to ensure the package was to be sent there as this was an application for the state of Texas. We left multiple messages starting Friday October 19, 2018 thru Tuesday October 23, 2018 requesting a call back to verify the correct mailing address. We received a call back on Tuesday October 23, 2018 in which we were instructed to send the permit application and payment to another address altogether with the Division of Management Authority.

We are now sending the permit application and payment to the Division of Management Authority (Branch of Permits, MS: IA) with the address of 5275 Leesburg Pike, Falls Church, VA 22041-3803 as instructed by phone, and would appreciate the application be processed without penalties or extra charges. We have provided the FedEx documentation that the original package would have arrived in Chandler AZ on the morning of October 17, 2018.

If you have any questions please feel free to call Cassie Drzymalla a(b)(6)

Thank You

Ex. Shipping Tracking Printing Services Locations Support Jennifer

TRACK ANOTHER SHIPMENT

(b)(6)

Scheduled delivery:
Thursday 10/18/2018 by 10:30 am

IN TRANSIT

At FedEx destination facility

TEMPE, AZ

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CHANDLER, AZ US

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Shipment Facts

10/18/2018 - Thursday	6:19 am	At local FedEx facility TEMPE, AZ
10/17/2018 - Wednesday	5:07 pm	At local FedEx facility TEMPE, AZ
	9:52 am	Delivery exception Customer not available or business closed TEMPE, AZ
	8:48 am	On FedEx vehicle for delivery TEMPE, AZ

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	8:26 am	At local FedEx facility TEMPE, AZ
	5:43 am	At destination sort facility PHOENIX, AZ
	4:39 am	Departed FedEx location MEMPHIS, TN
10/16/2018 - Tuesday	11:59 pm	Arrived at FedEx location MEMPHIS, TN
	7:10 pm	Picked up SAN ANTONIO, TX
	9:06 am	Shipment information sent to FedEx

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Your Shipment Details

From:	[redacted] San Antonio, TX 78258 US 2104792500	**Ship date:**	10/16/2018
		Weight:	1.00 LBS
		Declared value:	0.00 USD
		Package Contents:	
		Document Description:	
		Shipment Purpose:	
		Invoice number:	
		Freight On Value:	
To:	Office of Law Enforcement U.S. Fish & Wildlife Services 2545 W Frye Rd Suite 8 CHANDLER, AZ 85224 US 4809672007	**Pricing Option:**	FedEx Standard Rate
		Service type:	Priority Overnight
		Package type:	FedEx Envelope
		Pickup/Drop Off:	Drop off package at FedEx location
		Your reference:	Jeff Personal
		Discounted variable %:	
		Special services:	
Tracking no.:	773485297551	**Shipment type:**	Express
		Commercial/Residential Status:	Commercial

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RCVD NOV 3 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A.	**Complete if applying as an individual**		
1.a. Last name: Smithers	1.b. First name: Jeffrey	1.c. Middle name or initial: Davis	1.d. Suffix:
2. (b)(6)		5. Affiliation/ Doing business as (see instructions)	
6.a. T (b)(6)		6.d. E-mail address (b)(6)	

B.	**Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**		
1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C.	**All applicants complete address information**			
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b)(6)				
1.b. City: San Antonio	1.c. State: Texas	1.d. Zip code/Postal code: 78258	1.e. County/Province: Bexar	1.f. Country: USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount indicated on pages 6 and 7.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes [X] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA86472B-0 No [ ]

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the bes d that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b)(6)

Sig sponsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 10/15/18

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (http://www.fws.gov/forms/3-200-3.pdf) and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to http://www.fws.gov/international/permits/by-form-number/index.html to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend MA86472B-0.

2. Submit the original permit with this application.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

4. **Annual Report.** If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

5. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

6. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signat[redacted] Date: 10/15/18

   b. For **CHANGES** t[redacted]

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

7. All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

8. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

9. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

   ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 8. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email): Cassie DeZyMALLA

(b)(6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

LION ZIMBABWE ESA TROPHY

Permit Number: MA86472B-0
Effective: 10/19/2017 Expires: 10/18/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JEFFREY DAVIS SMITHERS
(b)(6) [redacted]
SAN ANTONIO, TX 78258
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. **Trophy must have been taken during the 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

From: King, Jenna D
To: hr@smithersconstruction.com
Subject: FWS Permit no. 86472B
Date: Wednesday, August 19, 2020 8:50:40 AM

Hello Ms. Cassie Drzymalla,

This email is in regard to the FWS permit application #86472B for Mr. Jeffrey Smithers to import a lion trophy from Zimbabwe. On the application, it was indicated that the lion was taken in May 2016. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

From: King, Jenna D
To: jsmithers@smithersconstruction.com
Subject: FWS Permit no. 86472B
Date: Friday, August 21, 2020 9:01:50 AM

Hello Mr. Smithers,

This email is in regard to your FWS permit application #86472B to import a lion trophy from Zimbabwe. On the application, it was indicated that the lion was taken in May 2016. Please provide the specific date that the lion was taken.

Please reply directly to this email with the requested information.

Thank you and let me know if you have any questions.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office ***within 45 calendar days of the date of this email****, your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.*

Thank you,

Jenna King
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
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